

# EXHIBIT S

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA BARBOUNIS,	)	CIVIL ACTION - LAW
	)	
Plaintiff	)	
	)	
-vs-	)	NO. 2:19-cv-05030
	)	
THE MIDDLE EAST FORUM, et	)	
al.,	)	
	)	
Defendants	)	
_____	X	

\* \* \*

The recorded video deposition of PATRICIA McNULTY, taken remotely via Zoom, on Friday, February 5, 2021, beginning at 10:12 a.m., before Carrie A. Kaufman, Registered Professional Reporter and Notary Public in and for the Commonwealth of Pennsylvania.

A P P E A R A N C E S:

On behalf of the Plaintiff:

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Also Present:

Alex Held (Via Zoom)  
Everest Court Reporting  
Video Specialist

Gregg Roman (Via Zoom)  
Daniel Pipes (Via Zoom)  
Matthew Mainen (Via Zoom)  
Marc Fink (Via Zoom)

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(Exhibits retained by counsel.)

<p>Page 4</p> <p>1 THE VIDEO SPECIALIST: We are now 2 on the record. Today's date is February 3 5th, 2021, and the time is 10:12 a.m. 4 Eastern. 5 This is the recorded video 6 deposition of Patricia McNulty in the 7 matter of Lisa Barbounis versus Middle 8 East Forum, et al., United States 9 District Court, Eastern District of 10 Pennsylvania, Civil Action Number 11 2:19-CV-05030-JDW. 12 My name is Alex Held, and I'm the 13 video specialist from Everest Court 14 Reporting. The court reporter today is 15 Carrie Kaufman also from Everest Court 16 Reporting. All counsel appearing today 17 will be noted on the stenographic 18 record. 19 Will the court reporter please 20 swear in the witness. 21 --- 22 P A T R I C I A M c N U L T Y 23 WAS CALLED AND HAVING BEEN DULY SWORN 24 WAS EXAMINED AND TESTIFIED AS FOLLOWS: 25 ---</p>	<p>Page 6</p> <p>1 Q. Okay. Have you ever been deposed 2 outside of what I'll call the Middle East Forum 3 cases? 4 A. No. 5 Q. Okay. So you've already been given the 6 instructions for depositions, and I'm sure at this 7 point the process has become familiar to you, but 8 I'll run you through a couple things just as a 9 reminder since we are on Zoom for this deposition 10 rather than in person and that creates some 11 difficulties and some headaches that we'll be able to 12 get through but just for the sake of a reminder. 13 It's obviously even more important 14 today that you and I try not to talk over each other. 15 I promise that I will do my best to let you finish 16 every one of your answers, and I would ask that in 17 return you let me finish my questions before you try 18 to answer, even if you anticipate where I'm going, 19 even if the answer seems obvious; is that fair? 20 A. Sure. 21 Q. Okay. If you do -- 22 MR. CAVALIER: By the way, there's 23 some really really loud background 24 noise. 25 THE COURT REPORTER: Yeah, I'm</p>
<p>Page 5</p> <p>1 MR. CAVALIER: Seth, are you good 2 to go? 3 MR. CARSON: Yeah, I'm good. 4 MR. CAVALIER: Okay. I just 5 didn't want to start while -- without 6 making sure you were able to hear. 7 --- 8 EXAMINATION 9 BY MR. CAVALIER: 10 Q. Good morning, Ms. McNulty. My name is 11 Jon Cavalier. I'm a lawyer with Cozen O'Connor here 12 in Philadelphia, and I represent the Middle East 13 Forum and Gregg Roman in the litigation that you 14 brought against them. 15 You'll also note that Mr. Sid Gold and 16 Mr. Bill Rieser are in this deposition as well. I'm 17 going to ask you some questions to begin this morning 18 and then I'm going to turn it over to Mr. Gold and 19 Mr. Rieser who are also going to have questions for 20 you. Okay? 21 I understand you've been deposed before 22 in these cases. Do you recall how many times you've 23 sat for a deposition? 24 A. Twice before -- three -- three times 25 before.</p>	<p>Page 7</p> <p>1 getting a lot of interference also. 2 MR. CAVALIER: Okay. It actually 3 sounds pretty good now. Is that good on 4 your end, Carrie? 5 THE COURT REPORTER: Yeah, it does 6 seem better now. Thank you. 7 MR. CAVALIER: Okay. Okay. Sorry 8 about that. 9 BY MR. CAVALIER: 10 Q. Additionally, waiting for me to get my 11 question out will give your counsel time to object 12 to the question if he wants to. You may hear him object 13 today, you probably will, but to the extent he simply 14 objects to my question, because we're in a deposition 15 as opposed to a trial, you're still expected to 16 answer the question unless he instructs you 17 specifically not to answer. Is that fair? 18 A. Okay. 19 Q. Okay. We need verbal answers today, 20 which you're already doing good with. Head nods -- 21 even though we are on video, things like head nods or 22 other gestures don't register for the court reporter 23 who is taking down everything that you say today. 24 That transcript is the most important thing to come 25 out of today, so it's very important that your</p>

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<p>1 answers, whether they be yes, no, or a detailed</p> <p>2 answer, are accurately transcribed by the court</p> <p>3 reporter. Her job is hard enough in regular times</p> <p>4 where we're all sitting in the same room, but when</p> <p>5 we're doing this over Zoom it's doubly hard. So it's</p> <p>6 really important for both of us that we answer</p> <p>7 verbally in a way that the court reporter can</p> <p>8 understand so that she can take down our words.</p> <p>9 Okay?</p> <p>10 A. Okay.</p> <p>11 Q. If you need a break today, just say so.</p> <p>12 This is not an endurance test. You're always welcome</p> <p>13 to take a break, get up, walk around, two minutes,</p> <p>14 five minutes. If you get hungry or you want to get a</p> <p>15 drink, that's all fine, too. The only thing I would</p> <p>16 ask is if there -- to the extent there is a question</p> <p>17 pending, that we finish up the answer to that</p> <p>18 question before we break. But you're welcome to take</p> <p>19 a break at any time.</p> <p>20 Is there any reason today that you</p> <p>21 won't be able to tell the truth or any other</p> <p>22 condition that you might be dealing with that would</p> <p>23 affect your memory?</p> <p>24 A. No.</p> <p>25 Q. Okay. Are you represented here today?</p>	<p>1 A. No.</p> <p>2 Q. Have you read them?</p> <p>3 A. No.</p> <p>4 Q. Did you ever discuss them with anybody?</p> <p>5 A. No.</p> <p>6 Q. Did you ever talk about your prior</p> <p>7 depositions with anybody?</p> <p>8 A. No.</p> <p>9 Q. Okay. Just give me one second here to</p> <p>10 get my documents together. I want to share some</p> <p>11 things with you today.</p> <p>12 Ms. McNulty, do you know what I mean</p> <p>13 when I reference something called discovery in civil</p> <p>14 litigation?</p> <p>15 A. I believe so. Anything that's been</p> <p>16 handed over.</p> <p>17 Q. Okay. So you understand that as part</p> <p>18 of the civil process the parties to litigation are</p> <p>19 required to share documents with each other pursuant</p> <p>20 to what I'll refer to as discovery requests from each</p> <p>21 side, correct?</p> <p>22 A. Correct. Yes.</p> <p>23 Q. Okay. And you're aware that the</p> <p>24 defendants in this -- in your action that you brought</p> <p>25 against the Forum and Mr. Roman have served discovery</p>
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<p>1 A. Yes.</p> <p>2 Q. And who is your counsel?</p> <p>3 A. Seth.</p> <p>4 Q. Seth Carson?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. Did you prepare for today's</p> <p>7 deposition at all?</p> <p>8 A. I spoke with Seth.</p> <p>9 Q. And when did you do that?</p> <p>10 A. Yesterday and this morning.</p> <p>11 Q. And how long did you speak with Seth</p> <p>12 for yesterday?</p> <p>13 A. Maybe an hour.</p> <p>14 Q. Okay. And how long did you speak with</p> <p>15 him for this morning?</p> <p>16 A. 20 minutes maybe.</p> <p>17 Q. Did you review any documents?</p> <p>18 A. We didn't review any documents, no.</p> <p>19 Q. Okay. You said that you've been</p> <p>20 deposed in these cases I think you said two or three</p> <p>21 times before today?</p> <p>22 A. Three I think.</p> <p>23 Q. Three? Have you looked at your -- the</p> <p>24 transcripts that were produced from those prior</p> <p>25 depositions?</p>	<p>1 requests on you in this case, correct?</p> <p>2 A. Yes.</p> <p>3 Q. Okay.</p> <p>4 MR. CARSON: No, that's not true.</p> <p>5 What you just said is not true.</p> <p>6 MR. CAVALIER: Let me rephrase</p> <p>7 that.</p> <p>8 BY MR. CAVALIER:</p> <p>9 Q. You're aware that the defendants, the</p> <p>10 Forum -- let me back up actually.</p> <p>11 Do you understand that when I say the</p> <p>12 Forum I'm referring to the Middle East Forum?</p> <p>13 A. Yes.</p> <p>14 Q. So it's fair for today's purposes that</p> <p>15 to the extent I say the Forum or MEF we'll know what</p> <p>16 each other is talking about, correct?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And to address your counsel's</p> <p>19 objection, you understand, do you not, that in the</p> <p>20 case that you filed against the Forum and Mr. Roman</p> <p>21 the Forum has issued discovery requests to you,</p> <p>22 correct?</p> <p>23 A. We have to provide discovery for that</p> <p>24 case.</p> <p>25 Q. Okay.</p>

<p>Page 12</p> <p>1 A. Right.</p> <p>2 Q. I'm going to show them to you, but</p> <p>3 sitting here this morning do you recall offhand</p> <p>4 whether you've ever seen the discovery requests that</p> <p>5 the Forum served on you?</p> <p>6 A. No, I haven't.</p> <p>7 Q. Okay.</p> <p>8 MR. CARSON: I'm going to object.</p> <p>9 She receives them when I receive them.</p> <p>10 So, yes, she has, the answer to the</p> <p>11 question is yes, she received them the</p> <p>12 day I got them in an e-mail from</p> <p>13 defendants.</p> <p>14 MR. CAVALIER: Seth, are you</p> <p>15 answering the question for your witness?</p> <p>16 MR. CARSON: Yeah, I am, because</p> <p>17 you're not going to trick her into</p> <p>18 saying things she doesn't understand.</p> <p>19 MR. CAVALIER: I'm going to show</p> <p>20 her a document --</p> <p>21 MR. CARSON: Patricia, when I</p> <p>22 receive discovery -- Patricia, when I</p> <p>23 receive discovery requests and you and I</p> <p>24 go over them, that's you receiving them.</p> <p>25 Okay? Just so you understand what he's</p>	<p>Page 14</p> <p>1 you to take your time and look at it to the extent</p> <p>2 you need to to identify it before you answer.</p> <p>3 A. Yes, I believe this is one of the ones</p> <p>4 that I went through with my lawyer.</p> <p>5 Q. Okay. And when you say you went</p> <p>6 through this with your lawyer, I do not want to know</p> <p>7 what you talked about with Seth, but I would like to</p> <p>8 know when you recall going through this with your</p> <p>9 lawyer.</p> <p>10 A. It was a couple weeks ago.</p> <p>11 Q. Okay.</p> <p>12 MR. CARSON: Object -- yeah, and</p> <p>13 I'm going to object. We're not going to</p> <p>14 answer any other questions about how we</p> <p>15 went -- or how we went through</p> <p>16 discovery. So if you want to ask the</p> <p>17 questions for the record, I can continue</p> <p>18 to object, I'm going to instruct her not</p> <p>19 to answer those questions.</p> <p>20 MR. CAVALIER: I'm not sure I</p> <p>21 understand the scope or the basis of</p> <p>22 your objection, but I'll just keep</p> <p>23 asking --</p> <p>24 MR. CARSON: You're not going to</p> <p>25 ask her when, how long, how, you're not</p>
<p>Page 13</p> <p>1 trying to ask you.</p> <p>2 THE WITNESS: Okay.</p> <p>3 MR. CAVALIER: I'm not trying to</p> <p>4 trick her. I'm going to show her the</p> <p>5 documents.</p> <p>6 MR. CARSON: Okay. Well, let's</p> <p>7 just be clear for the record.</p> <p>8 MR. CAVALIER: We're going to be</p> <p>9 clear, but we need the record to be</p> <p>10 clear what the witness's answer --</p> <p>11 MR. CARSON: Well, I think we're</p> <p>12 clear now, now that I cleared it up, I</p> <p>13 think she could answer, so go ahead.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. I'm going to try to share this with</p> <p>16 you. Hopefully it works.</p> <p>17 Can you see that document, Ms. McNulty?</p> <p>18 A. Yes.</p> <p>19 Q. How do I give you control of this.</p> <p>20 I think I just gave you control of the</p> <p>21 document. Can you see if it works? Can you scroll</p> <p>22 up and down through this document?</p> <p>23 A. Yes, I can.</p> <p>24 Q. Okay. So then I'm going to ask you</p> <p>25 whether you've seen this document before, but I want</p>	<p>Page 15</p> <p>1 going to -- you're not going to do that,</p> <p>2 and she's not going to answer those</p> <p>3 questions based on privilege.</p> <p>4 MR. CAVALIER: How about you let</p> <p>5 me ask the question and then if you have</p> <p>6 an objection you can state it for the</p> <p>7 record.</p> <p>8 MR. CARSON: Okay. Well, I had an</p> <p>9 objection that I just put on the record</p> <p>10 where she answered and -- so I objected,</p> <p>11 privilege, I didn't want her to answer,</p> <p>12 my phone was on mute, so the last</p> <p>13 question there is an objection on the</p> <p>14 record to the last question, privilege.</p> <p>15 BY MR. CAVALIER:</p> <p>16 Q. Ms. McNulty, I see that you're still</p> <p>17 scrolling through the document. I don't want to ask</p> <p>18 you a question if you're looking at it, but when</p> <p>19 you're done let me know and I'll move on to the next</p> <p>20 question.</p> <p>21 A. I'm done.</p> <p>22 Q. Okay. So, for the record, this</p> <p>23 document is your answers to our first request for</p> <p>24 production of documents. Do you understand what I</p> <p>25 mean when I say that?</p>



<p>Page 16</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And, again, just for the record,</p> <p>3 the way this is formatted you'll see our request</p> <p>4 here, I highlighted Request Number 1, for example,</p> <p>5 and then your response below that. Do you see that?</p> <p>6 A. Uh-huh.</p> <p>7 Q. Okay. Do you remember whether you read</p> <p>8 this document before it was served on defendants in</p> <p>9 this case?</p> <p>10 MR. CARSON: Objection.</p> <p>11 Don't answer.</p> <p>12 Privilege.</p> <p>13 MR. CAVALIER: The question is</p> <p>14 whether she remembers reviewing a</p> <p>15 document and you're --</p> <p>16 MR. CARSON: Yeah, because if the</p> <p>17 way she read it is that I read it to</p> <p>18 her, then it's privileged, and so she's</p> <p>19 not going to answer the question.</p> <p>20 MR. CAVALIER: So you're -- you're</p> <p>21 saying on the record that the fact that</p> <p>22 you read her discovery responses to her</p> <p>23 --</p> <p>24 MR. CARSON: No, I didn't say</p> <p>25 that. I said if the answer to the</p>	<p>Page 18</p> <p>1 instructing her not to verify whether</p> <p>2 she reviewed her own discovery</p> <p>3 responses --</p> <p>4 MR. CARSON: I'm telling her not</p> <p>5 to say anything that I said to her, and</p> <p>6 if the answer requires her to confirm</p> <p>7 communications between counsel and a</p> <p>8 named -- and a named plaintiff in</p> <p>9 another case and a witness in this case,</p> <p>10 she's not going to answer it. She's not</p> <p>11 going to tell you those things.</p> <p>12 MR. CAVALIER: I'm not asking her</p> <p>13 for any communication between the two of</p> <p>14 you, and I'll say for the record,</p> <p>15 Ms. McNulty, I do not want to hear about</p> <p>16 anything that you and your counsel</p> <p>17 talked about. I'm not asking you to</p> <p>18 describe communications. I'm not asking</p> <p>19 you the substance of those</p> <p>20 communications. The question is very</p> <p>21 simple. Did you review your responses</p> <p>22 to our discovery before serving them.</p> <p>23 MR. CARSON: The answer to the --</p> <p>24 there is an objection on the record.</p> <p>25 Privilege. To answer that question she</p>
<p>Page 17</p> <p>1 question is that I read it to her, she</p> <p>2 can't answer. Privilege. She's not</p> <p>3 going to tell you things I said to her.</p> <p>4 Just --</p> <p>5 Patricia -- the objection is on</p> <p>6 the record. Do not answer.</p> <p>7 Next question, please.</p> <p>8 BY MR. CAVALIER:</p> <p>9 Q. Did you review your responses to our</p> <p>10 discovery requests before sending it out to us?</p> <p>11 MR. CARSON: Objection.</p> <p>12 Do not answer.</p> <p>13 Privilege.</p> <p>14 Next question.</p> <p>15 MR. CAVALIER: I'm going to need</p> <p>16 you -- Seth, I'm going to need you to</p> <p>17 explain the basis of your --</p> <p>18 MR. CARSON: Same basis as the</p> <p>19 last question.</p> <p>20 MR. CAVALIER: Pardon me?</p> <p>21 MR. CARSON: Same basis as the</p> <p>22 last question.</p> <p>23 MR. CAVALIER: So I want to be</p> <p>24 very very clear about this for the</p> <p>25 record. You're not -- you're</p>	<p>Page 19</p> <p>1 would have to tell you about</p> <p>2 communications between me and her.</p> <p>3 MR. CAVALIER: Seth, you</p> <p>4 understand that just because you convey</p> <p>5 information to a client doesn't</p> <p>6 automatically make that information</p> <p>7 privileged, correct?</p> <p>8 MR. CARSON: No, that is</p> <p>9 incorrect. It actually does,</p> <p>10 particularly when the communication is</p> <p>11 between only attorney and client and it</p> <p>12 relates directly to the case in pending</p> <p>13 litigation.</p> <p>14 MR. CAVALIER: So your position is</p> <p>15 if I tell my client the sky is blue,</p> <p>16 that is now privileged?</p> <p>17 MR. CARSON: No, my position is if</p> <p>18 I go over discovery requests and we</p> <p>19 review them together and I read them to</p> <p>20 her, that -- all those conversations are</p> <p>21 privileged.</p> <p>22 MR. CAVALIER: I'm not asking you</p> <p>23 what you talked about with her. I'm not</p> <p>24 asking her about what you reviewed. All</p> <p>25 I'm asking --</p>



<p>1 MR. CARSON: If she says --</p> <p>2 MR. CAVALIER: For the record, her</p> <p>3 discovery responses are not verified.</p> <p>4 Okay? This is a simple procedural</p> <p>5 matter. You didn't verify --</p> <p>6 MR. CARSON: Yeah, exactly, so why</p> <p>7 don't you get me to send you a</p> <p>8 verification. I can do it right now.</p> <p>9 MR. CAVALIER: We've tried to do</p> <p>10 that for months and it hasn't happened.</p> <p>11 I'm trying to find out whether</p> <p>12 she looked --</p> <p>13 MR. CARSON: You have not tried to</p> <p>14 do that for months. It's a ridiculous</p> <p>15 thing to even say. Not tried to do it</p> <p>16 for months. Not tried to do it once.</p> <p>17 MR. CAVALIER: Seth, there have</p> <p>18 been plenty of ridiculous things --</p> <p>19 MR. CARSON: I can't think of one</p> <p>20 --</p> <p>21 MR. CAVALIER: You know what, I'm</p> <p>22 not going to --</p> <p>23 MR. CARSON: Forward me the e-mail</p> <p>24 where you told me that you needed me to</p> <p>25 send over a verification.</p>	<p>Page 20</p> <p>1 questions of my client. Just -- you</p> <p>2 know what I mean, it's just not the way</p> <p>3 discovery is supposed to work and that's</p> <p>4 why we are where we are right now.</p> <p>5 BY MR. CAVALIER:</p> <p>6 Q. Ms. McNulty, are you aware -- with that</p> <p>7 preamble from your counsel about how discovery is</p> <p>8 supposed to work, are you aware that you've been</p> <p>9 found to be in civil contempt by a judge of the</p> <p>10 Eastern District of Pennsylvania for discovery</p> <p>11 violation?</p> <p>12 MR. CARSON: Objection.</p> <p>13 Privilege.</p> <p>14 MR. CAVALIER: Again, I need you</p> <p>15 to explain how her awareness of</p> <p>16 something is privileged or not.</p> <p>17 MR. CARSON: If the way she became</p> <p>18 aware requires her to tell you about</p> <p>19 communications between she and I, then</p> <p>20 it's privileged.</p> <p>21 MR. CAVALIER: Seth, awareness --</p> <p>22 I'm not asking her how she became --</p> <p>23 MR. CARSON: It's also not</p> <p>24 material at all to the reason why we're</p> <p>25 here today, by the way, has nothing to</p> <p>Page 22</p>
<p>1 BY MR. CAVALIER:</p> <p>2 Q. The question is, did you review your</p> <p>3 discovery responses for accuracy before you served</p> <p>4 them?</p> <p>5 MR. CARSON: Objection.</p> <p>6 Privilege.</p> <p>7 MR. CAVALIER: All right. We'll</p> <p>8 table that one for now. Trying to do</p> <p>9 this quick, but we'll get it --</p> <p>10 MR. CARSON: I mean, we'll send</p> <p>11 you a verification. They were reviewed,</p> <p>12 I can confirm they were reviewed by her</p> <p>13 and me, and we would be happy to send</p> <p>14 you a verification. I would have sent</p> <p>15 one already if you would have just</p> <p>16 e-mailed me and said, hey, we need a</p> <p>17 verification. That's the point of</p> <p>18 discovery is working together to try to</p> <p>19 get through these issues and not make it</p> <p>20 more difficult. Instead of just sending</p> <p>21 an e-mail, hey, Seth, we need a</p> <p>22 verification, hey, Seth, we don't have a</p> <p>23 verification, instead of doing that you</p> <p>24 want to file motions with the Court,</p> <p>25 sanctions, and ask dumb -- ask protected</p> <p>Page 21</p>	<p>1 do with Lisa Barbounis's case. Why</p> <p>2 don't you call Judge Wolson right now</p> <p>3 and ask him if you can ask that</p> <p>4 question.</p> <p>5 MR. CAVALIER: Seth, if you want</p> <p>6 -- you and I have an agreement in place</p> <p>7 that these depositions are unlimited in</p> <p>8 scope. That's why we let you off the</p> <p>9 hook from having to pay for our fees.</p> <p>10 MR. CARSON: Right. I mean, if</p> <p>11 you want to try to take advantage of the</p> <p>12 situation, I'm going to push back.</p> <p>13 Okay?</p> <p>14 MR. CAVALIER: I'm trying to ask</p> <p>15 --</p> <p>16 MR. CARSON: Next question.</p> <p>17 MR. CAVALIER: -- a simple</p> <p>18 question about whether or not she's</p> <p>19 aware --</p> <p>20 MR. CARSON: Next question.</p> <p>21 MR. CAVALIER: You gave a big</p> <p>22 speech on the record about how discovery</p> <p>23 is supposed to work, and I'm wondering</p> <p>24 whether your client based on that speech</p> <p>25 that you just gave is aware that she's</p> <p>Page 23</p>

<p>Page 24</p> <p>1 been held in civil contempt by a judge 2 in the Eastern District. 3 MR. CARSON: There's a privilege 4 objection. Privilege. Next question. 5 MR. CAVALIER: Her awareness of a 6 fact is not privileged, Seth. 7 MR. CARSON: It is if it requires 8 her telling you that the reason she 9 became aware is because of 10 communications between attorney and 11 client. 12 MR. CAVALIER: Seth, I'm not 13 asking her to tell me how she became 14 aware. I'm not asking her to tell me 15 who told her. I'm not even asking her 16 if anybody told her. I'm simply asking 17 her whether she's aware of a fact. That 18 is the most basic type of deposition 19 question that is not privileged and you 20 can possibly get. 21 MR. CARSON: My objection is 22 noted. 23 MR. CAVALIER: Your objection is 24 noted, but your instructions -- 25 MR. CARSON: I'll let her say that</p>	<p>Page 26</p> <p>1 that, Patricia, if you want. 2 THE WITNESS: Yes. 3 MR. CARSON: You can answer that 4 one. 5 MR. CAVALIER: Okay. 6 BY MR. CAVALIER: 7 Q. I want to go back to your responses to 8 our discovery requests over here, and I want to talk 9 about a couple of these, but first I want to talk 10 about Request for Documents Number 21. The request 11 is for copies of applications, application forms, 12 business cards, postcards, letters, or documents you 13 received from any potential employer, headhunter, or 14 employment agency since your employment with the 15 Forum ended. 16 What did you do, other than speaking 17 with your counsel, what did you do to try and gather, 18 search for, copies of any application forms, business 19 cards, postcards, letters, or documents that you 20 received from any potential employer, headhunter, or 21 employment agency since your employment with the 22 Forum ended? 23 A. The only -- we looked in my LinkedIn 24 because that was the only thing I used at that time, 25 but they were all quick applies, so there was --</p>
<p>Page 25</p> <p>1 she's aware that she knows that there's 2 a motion filed. She hasn't actually 3 been held in -- no one has been held in 4 contempt yet, the Court hasn't actually 5 finalized any ruling, but -- she can say 6 yes or no to the question I guess so we 7 can move on. 8 BY MR. CAVALIER: 9 Q. Ms. McNulty, can you read what I've 10 just highlighted for the record? 11 A. Can I make this bigger? 12 Q. Yeah, sure, I'll make it bigger for 13 you. 14 A. Yes, I can read it. 15 Q. It says: Plaintiff is found in civil 16 contempt for failing to comply with Judge Brody's 17 October 15th, 2020, discovery order, Doc 33. 18 Did I read that correctly? 19 A. Yes. 20 Q. Having read that to you and without 21 asking at all whether you spoke to your counsel about 22 this issue, is it fair to say that you are aware that 23 you have been found in civil contempt for failing to 24 comply with discovery orders? 25 MR. CARSON: You can say yes to</p>	<p>Page 27</p> <p>1 Q. Okay. 2 A. -- nothing to actually -- 3 THE COURT REPORTER: Excuse me. 4 There's a lot of interference and it's 5 affecting my ability to be able to hear 6 clearly. 7 Okay. Thank you. 8 MR. CARSON: It's going to happen 9 when I take mute off. I have my 10 three-year-old in the bathtub. 11 BY MR. CAVALIER: 12 Q. Ms. McNulty, I think you said that you 13 used -- you searched LinkedIn? 14 A. Yes. 15 Q. Okay. Do you still use LinkedIn? 16 A. I have it. I don't really use it. 17 Q. Okay. Do you remember offhand -- and, 18 again, to be clear, this is not a memory test. I'm 19 not trying to trap you in some kind of a memory gap 20 here. With that said, I'm wondering whether offhand 21 you recall whether you discovered any documents when 22 you searched LinkedIn that would be responsive to 23 this request. 24 A. I don't believe I did. 25 Q. Okay. I want to look at the response</p>

<p>Page 28</p> <p>1 that you did give to this request, the written 2 response here, and that is this. It says: Plaintiff 3 is not in possession of any documents related to this 4 request. Plaintiff objects to providing defendants 5 with documents related to Congressman Randy Weber, as 6 plaintiff's employment with Congressman Weber does 7 not require plaintiff to produce to defendants 8 plaintiff's business cards or other cards.</p> <p>9 MR. CARSON: What's the point of 10 this question right now.</p> <p>11 BY MR. CAVALIER: 12 Q. That's actually my question to you. 13 You don't work for Congressman Randy Weber, correct?</p> <p>14 MR. CARSON: You guys provided 15 verbatim the exact same discovery 16 request to two different people. I 17 mean, it's clear what happened. She 18 doesn't work for Congressman Randy 19 Weber. You guys know she doesn't work 20 for Congressman Randy Weber. What's the 21 point of these questions.</p> <p>22 MR. CAVALIER: Seth, that's 23 exactly --</p> <p>24 MR. CARSON: Is there any --</p> <p>25 MR. CAVALIER: -- the point of</p>	<p>Page 30</p> <p>1 Privilege. 2 MR. CAVALIER: Question is whether 3 she read something and that's 4 privileged? 5 MR. CARSON: Yeah. Yeah. If the 6 way she read it is that it was read to 7 her by me, then she can't answer. 8 Privilege. 9 MR. CAVALIER: I don't even 10 understand what that means. 11 MR. CARSON: It's privileged. 12 Do not answer. 13 Next question. 14 MR. CAVALIER: Seth, again, I just 15 want to be very clear on this. You're 16 instructing her not to answer a question 17 about whether she read something. 18 MR. CARSON: I'm instructing her 19 not to answer the question if the reason 20 why she read it it was a communication 21 between counsel and his client. 22 MR. CAVALIER: Well, I would hope 23 the reason -- 24 MR. CARSON: And therefore it's 25 privileged.</p>
<p>Page 29</p> <p>1 these questions is that -- 2 MR. CARSON: Is there any reason 3 to ask any of them? This isn't even a 4 deposition in her case. Unless you guys 5 want to turn it into that and then we 6 can just continue and then we won't do 7 another one. Is that what you want to 8 do?</p> <p>9 MR. CAVALIER: I'm trying to find 10 out what happened here. That's why I'm 11 asking the question.</p> <p>12 MR. CARSON: All right. Yeah, 13 you're trying to find out. You did a 14 lot to find out before today.</p> <p>15 You can answer the question. The 16 question I think is do you work for 17 Congressman Randy Weber.</p> <p>18 THE WITNESS: No.</p> <p>19 BY MR. CAVALIER: 20 Q. And you never have, correct? 21 A. No. 22 Q. Did you read this response before it 23 was served? 24 MR. CARSON: Objection. 25 Don't answer.</p>	<p>Page 31</p> <p>1 MR. CAVALIER: I would hope the 2 reason why she -- okay. Let me scratch 3 that. 4 BY MR. CAVALIER: 5 Q. Ms. McNulty, when you serve responses 6 to discovery requests, is it important to you that 7 they are accurate? 8 MR. CARSON: Objection. I served 9 them. I mean, what are we doing right 10 now. You want -- if you want to turn 11 this into a deposition today for 12 Patricia, too, and we want to agree 13 she's not going to appear again, we 14 could continue down this road. If not, 15 we're going to move on. It's up to you. 16 MR. CAVALIER: Seth, I'm not going 17 to engage with you in a debate about 18 every objection you make. The question 19 is -- 20 MR. CARSON: No, I'm -- no, what 21 I'm saying to you right now is that 22 she's not going to answer the question 23 unless we agree that she doesn't have to 24 appear again for the hours that you're 25 taking up asking her questions about a</p>

<p>Page 32</p> <p>1 case that we're not here to talk about.</p> <p>2 MR. CAVALIER: Seth, the hours I'm</p> <p>3 taking up. You've spoken more on this</p> <p>4 record than I have. I would have been</p> <p>5 done by now.</p> <p>6 MR. CARSON: Right. Uh-huh.</p> <p>7 Well, if you want to make that agreement</p> <p>8 and then I will shut up --</p> <p>9 MR. CAVALIER: No, I'm not going</p> <p>10 to make an agreement. That's not how</p> <p>11 this works. You don't get to -- you</p> <p>12 don't get to throw a fit all over the</p> <p>13 record and then leverage me into an</p> <p>14 agreement --</p> <p>15 MR. CARSON: You also don't get to</p> <p>16 ask her questions about a case that</p> <p>17 we're not here to talk about today.</p> <p>18 MR. CAVALIER: Seth, you</p> <p>19 represented to me in writing repeatedly</p> <p>20 that the scope of these depositions</p> <p>21 would be unlimited and in exchange for</p> <p>22 that we agreed to waive the attorneys</p> <p>23 fees sanction that you were ordered to</p> <p>24 pay us as a result of the fact that --</p> <p>25 MR. CARSON: Never ordered to pay.</p>	<p>Page 34</p> <p>1 case that we're not here to talk about,</p> <p>2 that has nothing to -- we're not -- I</p> <p>3 mean, she's appearing today as a witness</p> <p>4 in Lisa Barbounis's case. What are you</p> <p>5 doing.</p> <p>6 MR. CAVALIER: Seth, I could get</p> <p>7 into a multitude of reasons why this is</p> <p>8 relevant and why it goes to her</p> <p>9 credibility, why --</p> <p>10 MR. CARSON: Why it's relevant --</p> <p>11 MR. CAVALIER: -- why this is the</p> <p>12 more efficient way of doing this, but</p> <p>13 I'm not obligated to do that, and I'm</p> <p>14 not going to waste the witness's time on</p> <p>15 the record going through all that. I</p> <p>16 would have been done this line of</p> <p>17 questioning by now.</p> <p>18 MR. CARSON: Why it's relevant</p> <p>19 whether or not there was language from</p> <p>20 another case in the responses that were</p> <p>21 served, has nothing to do --</p> <p>22 MR. CAVALIER: Goes to her</p> <p>23 credibility.</p> <p>24 MR. CARSON: -- with credibility.</p> <p>25 MR. CAVALIER: Goes to her</p>
<p>Page 33</p> <p>1 You never won an argument saying that we</p> <p>2 had to pay that. So please don't</p> <p>3 misstate the facts or the history.</p> <p>4 Never ordered to pay, first off. Second</p> <p>5 off, every single e-mail that I sent</p> <p>6 you, the subject line of that e-mail was</p> <p>7 Lisa Barbounis V. The Middle East Forum.</p> <p>8 I never sent you an e-mail in Patricia</p> <p>9 McNulty V. The Middle East Forum where I</p> <p>10 said you can ask whatever you want.</p> <p>11 Clearly whatever you want meant whatever</p> <p>12 you want related to the reason why we're</p> <p>13 doing the deposition, and it doesn't --</p> <p>14 it doesn't increase the scope to</p> <p>15 everything in the universe as you seem</p> <p>16 to have interpreted my statement.</p> <p>17 MR. CAVALIER: Seth, your</p> <p>18 statement was literally, and this is a</p> <p>19 quote, you can ask whatever you want,</p> <p>20 I'm not going to stop you.</p> <p>21 MR. CARSON: Right. Subject line</p> <p>22 Lisa Barbounis V. The Middle East Forum.</p> <p>23 And you can ask whatever you want, but</p> <p>24 you're not going to spend hours trying</p> <p>25 to embarrass her and waste time on a</p>	<p>Page 35</p> <p>1 credibility --</p> <p>2 MR. CARSON: Get the heck out of</p> <p>3 here.</p> <p>4 THE COURT REPORTER: One at a</p> <p>5 time, please.</p> <p>6 MR. CARSON: It does not go to</p> <p>7 credibility.</p> <p>8 I didn't hear. Someone just said</p> <p>9 something?</p> <p>10 THE COURT REPORTER: Yes, please</p> <p>11 talk one at a time. You're cancelling</p> <p>12 each other out when you talk at the same</p> <p>13 time.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. The question is, is it important,</p> <p>16 Ms. McNulty, for you to supply accurate answers to</p> <p>17 discovery requests?</p> <p>18 MR. CARSON: Objection.</p> <p>19 Privilege.</p> <p>20 You can answer.</p> <p>21 Objection, form; objection,</p> <p>22 assuming facts not in evidence;</p> <p>23 objection, lack of foundation.</p> <p>24 You can answer whether or not it's</p> <p>25 important to you to be accurate, yes or</p>



<p>1 no. 2 THE WITNESS: Yes. 3 MR. CARSON: Next question. 4 BY MR. CAVALIER: 5 Q. So then my question is, can you explain 6 how this answer ended up in your response to our 7 discovery request? 8 MR. CARSON: Objection. 9 Don't answer. 10 It's designed to embarrass and 11 harass the witness. It ended up there 12 obviously because someone missed 13 something. It's clear why it ended up 14 there. And she's not going to answer 15 questions designed only to embarrass and 16 harass. 17 Do not answer. 18 Next question, please. 19 THE COURT REPORTER: It's hard to 20 understand what you're saying, 21 Mr. Carson. 22 MR. CARSON: The question is 23 designed only to embarrass and harass, 24 it has no bearing on why we're here, no 25 relevance to the case, there's only one</p>	Page 36	<p>1 Don't answer that question. 2 It's designed only to embarrass 3 and harass. 4 Next question, please. 5 BY MR. CAVALIER: 6 Q. Do you think that we can trust the 7 accuracy of your written discovery responses? 8 MR. CARSON: Same objection. 9 Don't answer. 10 BY MR. CAVALIER: 11 Q. How many e-mail addresses have you used 12 since 2017? 13 A. Three I think. 14 Q. Can you list them for me? 15 A. My personal e-mail, the Middle East 16 Forum e-mail, and my current work e-mail. 17 Q. Okay. And can you state for the record 18 what the actual e-mail addresses are? 19 MR. CARSON: She'll state them off 20 the record. 21 MR. CAVALIER: Pardon? 22 MR. CARSON: She'll state them off 23 the record. We're not going to put her 24 personal e-mail addresses on the record. 25 THE WITNESS: Am I stating them</p>	Page 38
<p>1 reason to ask it, to harass and 2 embarrass. She's not going to do that. 3 I'm instructing her not to answer. 4 Let's go to the next question, please. 5 BY MR. CAVALIER: 6 Q. So this is Question Number 22, and do 7 you see that it contains the same reference to 8 Congressman Randy Weber? 9 A. Yes. 10 Q. Question Number 23, all 11 correspondences, written communications, or documents 12 offering you employment that you have received from 13 any persons since October 16th, 2017. 14 The response, do you see here that it 15 also refers to Congressman Randy Weber? 16 A. Yes. 17 Q. And so try and move this along, you 18 would agree with me, would you not, that the 19 responses to those questions are not accurate, 20 correct? 21 A. Yes. 22 Q. So given that -- what I've just showed 23 you, isn't it fair to say that your responses to our 24 document requests are not reliable? 25 MR. CARSON: Objection.</p>	Page 37	<p>1 off the record now? 2 MR. CARSON: Just don't answer. 3 We'll give them to him off the record. 4 MR. CAVALIER: I guess I could do 5 it this way then. 6 MR. CARSON: We're going to 7 object. Do not show her any personal 8 e-mail addresses on the record. Do not 9 ask her to confirm any personal e-mail 10 addresses on the record. She's not 11 going to do it. And we're telling you 12 right now we do not want that to be on 13 the record. 14 MR. CAVALIER: Seth, what is the 15 point of that objection? You don't -- I 16 mean, I got it -- 17 MR. CARSON: Yeah, we don't -- we 18 don't want her personal e-mail addresses 19 to end up on a public docket. 20 MR. CAVALIER: Well, I'm sorry 21 that you don't want her personal e-mail 22 addresses to end up on a public docket. 23 This is not the docket. It's the 24 deposition. 25 MR. CARSON: Yeah, and your client</p>	Page 39

<p>Page 40</p> <p>1 has shown the propensity to try to use</p> <p>2 --</p> <p>3 THE COURT REPORTER: I can't hear</p> <p>4 you, Mr. Carson.</p> <p>5 MR. CARSON: -- the public docket</p> <p>6 --</p> <p>7 THE COURT REPORTER: Can't hear</p> <p>8 you.</p> <p>9 MR. CARSON: Your client has shown</p> <p>10 a propensity in his attempt to use the</p> <p>11 public docket to stalk people and to</p> <p>12 harass people and to try to get people</p> <p>13 fired and -- and we would appreciate if</p> <p>14 we could just talk about any personal</p> <p>15 e-mail addresses off the record. If you</p> <p>16 still want to do it --</p> <p>17 MR. CAVALIER: Well, now that</p> <p>18 you've --</p> <p>19 MR. CARSON: -- based on my</p> <p>20 objection, you go ahead and do it, but</p> <p>21 --</p> <p>22 MR. CAVALIER: Now that you've put</p> <p>23 --</p> <p>24 MR. CARSON: -- we're telling you</p> <p>25 that we prefer not to.</p>	<p>Page 42</p> <p>1 doesn't end up on the docket. That's</p> <p>2 all.</p> <p>3 MR. CAVALIER: So your allegations</p> <p>4 of criminal conduct -- unsupported</p> <p>5 allegations that we've asked you for</p> <p>6 evidence to support many many times are</p> <p>7 okay --</p> <p>8 MR. CARSON: I sent you the</p> <p>9 recording -- I sent you a recording of</p> <p>10 the person whose statement was posted on</p> <p>11 the docket. What do you mean you asked</p> <p>12 for evidence that we haven't provided.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. Ms. McNulty, is</p> <p>15 patricia.mculty1@gmail.com an e-mail address that</p> <p>16 you've used within the last three years?</p> <p>17 MR. CARSON: Objection.</p> <p>18 THE WITNESS: No.</p> <p>19 BY MR. CAVALIER:</p> <p>20 Q. You've never used that -- you haven't</p> <p>21 used that e-mail address in the last three years.</p> <p>22 MR. CARSON: Objection. Asked and</p> <p>23 answered.</p> <p>24 MR. CAVALIER: I'm giving your</p> <p>25 witness a chance to make sure that she's</p>
<p>Page 41</p> <p>1 MR. CAVALIER: Now that you've put</p> <p>2 yet more untrue inflammatory and</p> <p>3 defamatory allegations on the record --</p> <p>4 MR. CARSON: It's objectively</p> <p>5 true. It's objectively true. Your</p> <p>6 client offered to pay someone for</p> <p>7 testimony, took an entire -- took an</p> <p>8 entire statement from the person, and</p> <p>9 then put the entire statement on the</p> <p>10 docket when he told the guy he was going</p> <p>11 to give him a, quote/unquote, wink and a</p> <p>12 nod and sort him out afterwards if he</p> <p>13 answered the questions that way, and</p> <p>14 then he put the entire conversation on</p> <p>15 the docket. It's objectively true what</p> <p>16 I just said.</p> <p>17 MR. CAVALIER: So I just want to</p> <p>18 be very clear for the record. You think</p> <p>19 that that statement you just made is</p> <p>20 appropriate but you're instructing your</p> <p>21 witness not to provide an e-mail address</p> <p>22 on the record?</p> <p>23 MR. CARSON: She'll provide it,</p> <p>24 she'll provide it all you want, we just</p> <p>25 prefer to do it off the record so it</p>	<p>Page 43</p> <p>1 accurate, Seth.</p> <p>2 MR. CARSON: Objection. Asked and</p> <p>3 answered.</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. You can answer it.</p> <p>6 MR. CARSON: You can answer again.</p> <p>7 THE WITNESS: No, I have a new</p> <p>8 Gmail -- I think that one gets like --</p> <p>9 if anybody were to have used it from</p> <p>10 years ago it would get filtered in, but</p> <p>11 I haven't used it in the past three</p> <p>12 years.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. Okay. So it's an old e-mail address</p> <p>15 that forwards to your current e-mail address,</p> <p>16 correct?</p> <p>17 A. Correct.</p> <p>18 Q. Have you used the e-mail address</p> <p>19 UNICOMP77@hotmail.com over the last three years?</p> <p>20 A. No.</p> <p>21 Q. Have you used an e-mail address that's</p> <p>22 reasonably similar to the address that I just read</p> <p>23 you?</p> <p>24 A. No.</p> <p>25 MR. CARSON: Objection. Asked and</p>

<p>1 answered.</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. How about the e-mail address</p> <p>4 TRISHAEIEEE@hotmail.com?</p> <p>5 A. No. I have an old one that's similar,</p> <p>6 but, again, not something I use.</p> <p>7 Q. So then is the old one that's similar</p> <p>8 -- you said you have an old one that's similar but</p> <p>9 you don't use it anymore?</p> <p>10 A. Uh-huh.</p> <p>11 Q. When was the last time you used it, do</p> <p>12 you remember?</p> <p>13 A. I don't remember.</p> <p>14 Q. Has it been within the last five years?</p> <p>15 A. Maybe.</p> <p>16 Q. Has it been within the last three</p> <p>17 years?</p> <p>18 MR. CARSON: Objection. Asked and</p> <p>19 answered.</p> <p>20 MR. CAVALIER: It's literally a</p> <p>21 different question.</p> <p>22 MR. CARSON: You said have you</p> <p>23 used this in the last three years and</p> <p>24 then you just said --</p> <p>25 MR. CAVALIER: I said have you</p>	<p>Page 44</p> <p>1 MR. CAVALIER: Seth, listen, stop</p> <p>2 puking all over my record and let me</p> <p>3 speak. I asked --</p> <p>4 MR. CARSON: No, I'm going to</p> <p>5 continue the way I'm going. I'm going</p> <p>6 to continue just like this. So --</p> <p>7 MR. CAVALIER: I asked her whether</p> <p>8 she used --</p> <p>9 MR. CARSON: The objection --</p> <p>10 MR. CAVALIER: -- the e-mail</p> <p>11 address --</p> <p>12 MR. CARSON: The objection --</p> <p>13 MR. CAVALIER: -- in the last five</p> <p>14 years --</p> <p>15 MR. CARSON: The objection is</p> <p>16 noted. Asked and answered.</p> <p>17 You can answer again.</p> <p>18 MR. CAVALIER: I asked her whether</p> <p>19 she used the e-mail address within the</p> <p>20 last five years. She said maybe.</p> <p>21 MR. CARSON: And then you said the</p> <p>22 last three years.</p> <p>23 MR. CAVALIER: That's correct.</p> <p>24 That's literally --</p> <p>25 MR. CARSON: And she had already</p>
<p>Page 45</p> <p>1 used it in the last five years.</p> <p>2 MR. CARSON: -- have you used it</p> <p>3 in the last three years.</p> <p>4 MR. CAVALIER: I said --</p> <p>5 MR. CARSON: Yeah, and then you</p> <p>6 just said three years again. Objection;</p> <p>7 asked and answered.</p> <p>8 Patricia, you can answer the same</p> <p>9 question --</p> <p>10 MR. CAVALIER: Seth, you need to</p> <p>11 get --</p> <p>12 MR. CARSON: -- that he's asking</p> <p>13 you twice.</p> <p>14 MR. CAVALIER: -- ahold of</p> <p>15 yourself. You need to get ahold of</p> <p>16 yourself, first of all.</p> <p>17 MR. CARSON: Yeah, thank you for</p> <p>18 the instruction. I don't take</p> <p>19 instructions from defense counsel,</p> <p>20 though. Objection; asked and answered.</p> <p>21 MR. CAVALIER: It would be wise to</p> <p>22 do so.</p> <p>23 MR. CARSON: Patricia, you're</p> <p>24 welcome -- yeah. Thank you. Again, I</p> <p>25 don't take advice from defense counsel.</p>	<p>Page 46</p> <p>1 answered --</p> <p>2 MR. CAVALIER: -- a different</p> <p>3 question.</p> <p>4 MR. CARSON: -- that question.</p> <p>5 No, it wasn't. You already -- you</p> <p>6 showed it to her and said did you use</p> <p>7 this in the last three years. That was</p> <p>8 your opening question.</p> <p>9 MR. CAVALIER: No, it was --</p> <p>10 MR. CARSON: She's welcome to</p> <p>11 answer it again.</p> <p>12 MR. CAVALIER: -- it was five</p> <p>13 years.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. Ms. McNulty, do you understand that</p> <p>16 there is a difference between five years and three</p> <p>17 years?</p> <p>18 MR. CARSON: Objection.</p> <p>19 Don't answer.</p> <p>20 Embarrass and harass.</p> <p>21 Do not answer that question.</p> <p>22 BY MR. CAVALIER:</p> <p>23 Q. Do you understand that? Because</p> <p>24 apparently --</p> <p>25 MR. CARSON: Don't answer.</p>



<p>Page 48</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. -- your counsel doesn't, so I'm just</p> <p>3 trying to move this along.</p> <p>4 MR. CARSON: Don't answer.</p> <p>5 She's welcome to answer the</p> <p>6 question about three years. It's just</p> <p>7 she already answered it. But she's</p> <p>8 welcome to answer it again.</p> <p>9 THE WITNESS: It would still get</p> <p>10 e-mails, but I don't use it.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. I don't understand the distinction that</p> <p>13 you're drawing there.</p> <p>14 A. It's old, so there is, like, repeated</p> <p>15 subscribed e-mails that would still come there, but I</p> <p>16 don't send e-mails from it.</p> <p>17 Q. Do you have a general sense of the last</p> <p>18 time you sent any e-mails from it?</p> <p>19 MR. CARSON: Objection. Asked and</p> <p>20 answered.</p> <p>21 BY MR. CAVALIER:</p> <p>22 Q. You can answer.</p> <p>23 A. I don't.</p> <p>24 Q. Did you ever send MEF information to</p> <p>25 that e-mail address?</p>	<p>Page 50</p> <p>1 Q. Did you look at your Facebook account</p> <p>2 when you were looking for information responsive</p> <p>3 to --</p> <p>4 MR. CARSON: Guys, I got to do</p> <p>5 like a five-minute break. All right?</p> <p>6 Could we go off the record for five</p> <p>7 minutes, please?</p> <p>8 MR. CAVALIER: That's fine. I'll</p> <p>9 withdraw the question. If you're going</p> <p>10 to take five, then I want to take ten.</p> <p>11 MR. CARSON: All right. Thank</p> <p>12 you.</p> <p>13 MR. CAVALIER: All right. Back on</p> <p>14 a couple minutes after 11.</p> <p>15 THE VIDEO SPECIALIST: Off the</p> <p>16 record.</p> <p>17 (A brief recess was taken from</p> <p>18 10:52 a.m. to 11:08 a.m.)</p> <p>19 THE VIDEO SPECIALIST: The time is</p> <p>20 11:08 a.m. Eastern. We are back on the</p> <p>21 record.</p> <p>22 BY MR. CAVALIER:</p> <p>23 Q. Okay. Ms. McNulty, we were talking</p> <p>24 when we left off I think about Instagram.</p> <p>25 THE COURT REPORTER: Too much</p>
<p>Page 49</p> <p>1 A. No.</p> <p>2 THE COURT REPORTER: Any what</p> <p>3 information?</p> <p>4 MR. CAVALIER: MEF information.</p> <p>5 BY MR. CAVALIER:</p> <p>6 Q. Do you use Instagram?</p> <p>7 A. Yes.</p> <p>8 Q. What e-mail address do you have</p> <p>9 associated with your Instagram account?</p> <p>10 A. I don't remember. I would have to</p> <p>11 look.</p> <p>12 Q. Do you use Facebook?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know what e-mail address is</p> <p>15 associated with your Facebook account?</p> <p>16 A. I don't.</p> <p>17 Q. Do you use Facebook Messenger?</p> <p>18 A. I have. I don't use it now.</p> <p>19 Q. Do you remember when the last time you</p> <p>20 used it was?</p> <p>21 A. I don't.</p> <p>22 Q. Have you used it since you -- since the</p> <p>23 last time that you worked for the Forum?</p> <p>24 A. I don't remember. I would have to</p> <p>25 look.</p>	<p>Page 51</p> <p>1 interference.</p> <p>2 MR. CARSON: I think we already</p> <p>3 asked questions about Instagram.</p> <p>4 MR. CAVALIER: I couldn't hear</p> <p>5 what was just said.</p> <p>6 THE COURT REPORTER: Neither could</p> <p>7 I.</p> <p>8 Go ahead, it's better now.</p> <p>9 BY MR. CAVALIER:</p> <p>10 Q. I think when we left off we were</p> <p>11 talking about Instagram, and I just wanted to ask you</p> <p>12 a couple questions about that and some other</p> <p>13 platforms.</p> <p>14 Correct me if I'm wrong, but I believe</p> <p>15 you said you did use Instagram?</p> <p>16 A. Yes.</p> <p>17 Q. And you told me that you weren't sure</p> <p>18 what e-mail address was associated with your</p> <p>19 Instagram account; is that correct?</p> <p>20 A. Correct.</p> <p>21 Q. Okay. I'm going to ask you to provide</p> <p>22 that through your counsel once we're done today.</p> <p>23 What is the username that you use --</p> <p>24 MR. CARSON: Yo, guys -- you guys</p> <p>25 got to go back. You guys got to go back</p>

<p>Page 52</p> <p>1 and start over. The host -- you guys 2 can't mute my microphone. I understand 3 there might be background noise, but you 4 can't mute it. I have to be able to put 5 objections on the record. So please 6 don't do that again, whoever did that. 7 I was talking the whole time, so you're 8 going to have to go back and redo the 9 last few questions. 10 MR. CAVALIER: Well, I certainly 11 didn't mute your microphone, but -- 12 MR. CARSON: I don't care who did 13 it, I'm just saying don't do it. 14 BY MR. CAVALIER: 15 Q. Ms. McNulty, I apologize. I'll go back 16 and ask the same questions again. 17 You testified earlier that you do use 18 Instagram, correct? 19 A. Correct. 20 MR. CARSON: Objection. Asked and 21 answered. 22 MR. CAVALIER: Are you really 23 objecting asked and answered after you 24 just made me go back and ask the 25 questions again?</p>	<p>Page 54</p> <p>1 from you, Ms. McNulty, and your counsel that you'll 2 provide the e-mail address and the username for your 3 Instagram account off the record after this 4 deposition is over? 5 MR. CARSON: Yeah. 6 MR. CAVALIER: Seth, is that 7 correct? 8 MR. CARSON: Correct. 9 BY MR. CAVALIER: 10 Q. Have you ever used Instagram to speak 11 to Lisa Barbounis? 12 A. Yes. 13 Q. Do you recall the subject of those 14 conversations? 15 A. I don't. 16 Q. When was the last time you used 17 Instagram to speak with Lisa Barbounis? 18 A. I don't remember. 19 Q. Was it more than a year ago? 20 A. I don't remember. 21 Q. Have you ever used Instagram to speak 22 to anyone about the Middle East Forum? 23 A. No. 24 Q. Have you ever used Instagram to speak 25 to Lisa Barbounis about anything having to do with</p>
<p>Page 53</p> <p>1 MR. CARSON: No, because you asked 2 those questions before we took the 3 break, so, yeah, objection, asked and 4 answered. 5 BY MR. CAVALIER: 6 Q. And I believe you testified -- 7 MR. CARSON: Jon, you're the one 8 who is going back and -- you're going to 9 go back and do testimony we just got 10 done doing the last 20 minutes? 11 BY MR. CAVALIER: 12 Q. And I believe you testified earlier 13 that you don't recall the e-mail address that you 14 used with your Instagram account; is that correct? 15 MR. CARSON: Objection. Asked and 16 answered. 17 THE WITNESS: Correct. 18 BY MR. CAVALIER: 19 Q. Do you know the username that you use 20 with Instagram? 21 MR. CARSON: Objection. She's not 22 going to tell you her username on the -- 23 she'll say it off the record. 24 BY MR. CAVALIER: 25 Q. All right, so we have a representation</p>	<p>Page 55</p> <p>1 the Middle East Forum? 2 A. No, I don't think so. 3 Q. Have you ever used Instagram to speak 4 to anyone about your lawsuit against the Middle East 5 Forum? 6 A. No. 7 Q. You testified earlier that you do use 8 Facebook, correct? 9 A. Correct. 10 Q. And do you recall the e-mail address 11 that you use with Facebook? 12 MR. CARSON: Objection. Asked and 13 answered. 14 THE WITNESS: I don't remember. 15 BY MR. CAVALIER: 16 Q. Do you know offhand the username that 17 you use with Facebook? 18 MR. CARSON: She'll say it off the 19 record, please. 20 MR. CAVALIER: Same 21 representation, Seth? You'll provide it 22 off the record after -- 23 MR. CARSON: Same representation. 24 BY MR. CAVALIER: 25 Q. Have you ever used Facebook to speak</p>

<p>Page 56</p> <p>1 with Lisa?</p> <p>2 A. Yes.</p> <p>3 Q. Do you remember the subject of those</p> <p>4 conversations?</p> <p>5 A. I don't remember.</p> <p>6 Q. Have you ever used Facebook to discuss</p> <p>7 --</p> <p>8 (Brief interruption.)</p> <p>9 BY MR. CAVALIER:</p> <p>10 Q. Have you ever used Facebook to talk</p> <p>11 about the Middle East Forum?</p> <p>12 A. I don't think so, no.</p> <p>13 Q. Have you ever used Facebook to speak</p> <p>14 with Delaney Yonchek?</p> <p>15 A. I don't remember.</p> <p>16 Q. Have you ever used Facebook to speak</p> <p>17 with Marnie Meyer or Marnie O'Brien?</p> <p>18 A. I don't remember.</p> <p>19 Q. Have you ever used Facebook to speak</p> <p>20 with Caitriona Brady?</p> <p>21 A. I don't remember.</p> <p>22 Q. Have you ever used Facebook to speak</p> <p>23 with any other Middle East Forum employee?</p> <p>24 A. I don't remember.</p> <p>25 Q. Do you use Twitter?</p>	<p>Page 58</p> <p>1 Myers?</p> <p>2 A. Not that I remember.</p> <p>3 Q. When you were responding to defendant's</p> <p>4 requests for documents did you look at your Twitter</p> <p>5 account to see whether there was any relevant</p> <p>6 information that might be responsive to those</p> <p>7 requests?</p> <p>8 A. Yes.</p> <p>9 Q. And did you find anything that was</p> <p>10 responsive?</p> <p>11 A. No.</p> <p>12 Q. How about for Facebook, when you were</p> <p>13 responding to defendant's document requests did you</p> <p>14 look at your Facebook account to see if there was any</p> <p>15 information that might be responsive?</p> <p>16 A. Yes.</p> <p>17 Q. And did you find anything that was</p> <p>18 responsive?</p> <p>19 A. No.</p> <p>20 Q. When you were reviewing your Facebook</p> <p>21 account -- let me back up because I can't remember</p> <p>22 which one you said you used to speak -- did you use</p> <p>23 Instagram or Facebook to speak with Lisa Barbounis?</p> <p>24 A. I've spoken to her on Instagram I know.</p> <p>25 Q. Okay. So when you were responding to</p>
<p>Page 57</p> <p>1 A. I have a Twitter. I don't actually</p> <p>2 tweet from it.</p> <p>3 Q. Do you use it to communicate with</p> <p>4 people?</p> <p>5 A. No.</p> <p>6 Q. Do you know the e-mail address that you</p> <p>7 used to sign up for a Twitter account?</p> <p>8 A. Not offhand, no.</p> <p>9 Q. Do you know your Twitter username?</p> <p>10 MR. CARSON: Same representation.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. Have you ever tweeted at all about</p> <p>13 anything ever?</p> <p>14 A. Yeah.</p> <p>15 Q. Do you know the last time you tweeted?</p> <p>16 A. I don't remember.</p> <p>17 Q. Was it within the last year?</p> <p>18 A. I don't remember.</p> <p>19 Q. Can you give any approximation at all</p> <p>20 as to the last time you think you tweeted anything?</p> <p>21 A. No, I don't remember.</p> <p>22 Q. Have you ever tweeted about Cinnamon</p> <p>23 Stillwell?</p> <p>24 A. Not that I remember.</p> <p>25 Q. Have you ever tweeted about Winfield</p>	<p>Page 59</p> <p>1 defendant's document requests did you look at your</p> <p>2 Instagram account to determine whether it contained</p> <p>3 any potentially responsive information?</p> <p>4 A. Yes.</p> <p>5 Q. And did you find any information that</p> <p>6 might be responsive to defendant's requests?</p> <p>7 A. No.</p> <p>8 Q. When you were reviewing your Instagram</p> <p>9 account to determine whether there was any responsive</p> <p>10 information in it did you review the communications</p> <p>11 that you had with Lisa Barbounis?</p> <p>12 A. Yes.</p> <p>13 Q. And you determined that those</p> <p>14 communications with Lisa Barbounis were not</p> <p>15 responsive to defendant's requests?</p> <p>16 MR. CARSON: I'm just going to</p> <p>17 object based on privilege. Those</p> <p>18 determinations were made together. But</p> <p>19 she can answer the question.</p> <p>20 THE WITNESS: Yes.</p> <p>21 BY MR. CAVALIER:</p> <p>22 Q. Yes, you determined they were not</p> <p>23 responsive?</p> <p>24 A. Correct.</p> <p>25 Q. Do you remember why you determined they</p>

<p>1 were not responsive?  2 MR. CARSON: Objection.  3 Privilege. I don't think she could  4 answer that one.  5 THE COURT REPORTER: What did you  6 say, Mr. Carson?  7 MR. CARSON: I don't think she can  8 answer that one because only reason she  9 would have made a determination was at  10 the advice of counsel. She can say that  11 if she wants.  12 BY MR. CAVALIER:  13 Q. Do you remember when you --  14 MR. CARSON: She can't say what  15 the substance of that is.  16 BY MR. CAVALIER:  17 Q. Do you remember when you reviewed those  18 communications with Lisa Barbounis on Instagram?  19 A. I don't remember exactly when it was.  20 Q. Was it last month?  21 A. Months ago, plural.  22 Q. Would it have been sometime in the  23 second half of 2020?  24 A. I don't remember exactly when it was.  25 Q. Do you remember the contents of those</p>	<p>Page 60</p>	<p>1 A. I opened up pictures from other people  2 within the past couple weeks.  3 Q. Okay. I'm assuming you're making a  4 distinction between using Snapchat and opening up  5 pictures, so --  6 A. Yes. I don't --  7 Q. -- let me -- let me ask a better  8 question. When was the last time you sent something  9 out via Snapchat?  10 A. I don't remember. Years ago maybe.  11 Q. Okay. But you said you've opened up  12 pictures on Snapchat, so I'm assuming that means that  13 people have sent you messages on Snapchat?  14 A. Yes.  15 Q. Okay. Do you remember when the last  16 time that occurred?  17 A. This week.  18 Q. And who do you receive messages from on  19 Snapchat?  20 A. Personal friends.  21 Q. Any current or former MEF employees?  22 A. No.  23 Q. Do you use Snapchat to speak with Lisa  24 Barbounis?  25 A. No.</p>	<p>Page 62</p>
<p>1 communications?  2 MR. CARSON: Obj- -- wait, what  3 communications?  4 MR. CAVALIER: The communications  5 with Lisa Barbounis.  6 MR. CARSON: You can answer that.  7 THE WITNESS: I mean, not exactly.  8 It was just like about memes and gifs  9 and things on Instagram, nothing  10 substantial in any way.  11 BY MR. CAVALIER:  12 Q. Is Lisa Barbounis a friend of yours?  13 A. Yes.  14 Q. How often do you talk to her?  15 A. Now? Maybe once a month, every couple  16 weeks.  17 Q. Did Lisa Barbounis ever share pictures  18 of men that she was dating with you on Instagram?  19 A. I don't remember.  20 Q. Do you have a Snapchat account?  21 A. Yes.  22 Q. Do you still use it?  23 A. No.  24 Q. Do you remember when the last time you  25 used it was?</p>	<p>Page 61</p>	<p>1 Q. Do you recall the e-mail address that  2 you used to sign up for your Snapchat account?  3 A. I don't.  4 Q. Do you know your username on Snapchat?  5 A. Yes.  6 MR. CARSON: Same representation?  7 MR. CAVALIER: That's fine, Seth.  8 MR. CARSON: Isn't the point of  9 Snapchat that the messages all erase,  10 though?  11 MR. CAVALIER: I didn't hear you.  12 MR. CARSON: I don't use any of  13 these apps, but isn't the point -- isn't  14 Snapchat the one where the messages all  15 erase?  16 MR. CAVALIER: I couldn't tell  17 you.  18 MR. CARSON: I don't know either.  19 All right.  20 BY MR. CAVALIER:  21 Q. Do you use an e-mail address  22 tmcnulty82@gmail.com?  23 A. Yes.  24 Q. Is that a current e-mail address?  25 A. Yes.</p>	<p>Page 63</p>

<p>Page 64</p> <p>1 Q. Do you use WhatsApp?</p> <p>2 A. Yes.</p> <p>3 Q. Do you recall the e-mail address or</p> <p>4 phone number that you used to sign up with -- for</p> <p>5 WhatsApp?</p> <p>6 A. Yes, the phone number.</p> <p>7 Q. Okay. You don't have to give it to me.</p> <p>8 We can use the same --</p> <p>9 MR. CAVALIER: Same</p> <p>10 representation, Seth?</p> <p>11 MR. CARSON: Yes.</p> <p>12 MR. CAVALIER: Okay.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. Have you used WhatsApp to speak with</p> <p>15 Lisa Barbounis?</p> <p>16 A. Yes.</p> <p>17 Q. When was the last time you used</p> <p>18 WhatsApp to speak with Lisa?</p> <p>19 A. I don't know. Years ago.</p> <p>20 Q. When you were reviewing your documents</p> <p>21 for responsiveness to defendant's discovery requests,</p> <p>22 did you look at your WhatsApp account to determine</p> <p>23 whether it contained any responsive communications?</p> <p>24 A. Yes.</p> <p>25 Q. Did you determine that -- did you</p>	<p>Page 66</p> <p>1 Q. Have you ever used Signal?</p> <p>2 A. No.</p> <p>3 Q. How many current phone numbers do you</p> <p>4 have?</p> <p>5 A. One.</p> <p>6 Q. Is that a cell phone?</p> <p>7 A. Yes.</p> <p>8 Q. Is that the same cell phone number that</p> <p>9 you had when you were at the Middle East Forum?</p> <p>10 A. Yes.</p> <p>11 Q. Do you have a landline phone?</p> <p>12 A. No.</p> <p>13 Q. Do you use any cloud-based storage</p> <p>14 systems?</p> <p>15 A. Not that I can think of.</p> <p>16 Q. Do you use iCloud?</p> <p>17 A. I mean, it comes with an iPhone I</p> <p>18 believe, so I guess yes.</p> <p>19 Q. Okay. So I don't want to put words in</p> <p>20 your mouth then, but is it fair to say that to the</p> <p>21 extent you use iCloud you use it just as an automatic</p> <p>22 default setting on your phone?</p> <p>23 A. Yes, if it's a default setting on my</p> <p>24 phone, then yes, but I don't actively use it that I</p> <p>25 know of.</p>
<p>Page 65</p> <p>1 review those communications with Lisa in an effort to</p> <p>2 determine if they were responsive?</p> <p>3 A. Yes.</p> <p>4 Q. And you determined that they were not</p> <p>5 responsive?</p> <p>6 A. With counsel.</p> <p>7 Q. Do you -- have you ever used WhatsApp</p> <p>8 to speak with a person named Raheem Kassam?</p> <p>9 A. I don't remember.</p> <p>10 Q. Have you used WhatsApp to speak with</p> <p>11 any other MEF employees?</p> <p>12 A. Not that I remember.</p> <p>13 Q. Have you used WhatsApp to speak with</p> <p>14 any MEF contractors?</p> <p>15 A. Not that I remember.</p> <p>16 Q. Have you used WhatsApp to speak with</p> <p>17 any MEF board members?</p> <p>18 A. I don't think so, no, not that I</p> <p>19 remember.</p> <p>20 Q. Have you used Snapchat to talk to any</p> <p>21 -- I'm sorry, have you used WhatsApp to talk to any</p> <p>22 MEF donors?</p> <p>23 A. Not that I know of, no.</p> <p>24 Q. Do you use Signal?</p> <p>25 A. No.</p>	<p>Page 67</p> <p>1 Q. Okay. So you don't -- you don't</p> <p>2 specifically and intentionally transfer documents to</p> <p>3 your iCloud account.</p> <p>4 A. No.</p> <p>5 Q. Okay. Do you know if you back up your</p> <p>6 phone via iCloud?</p> <p>7 A. I don't know.</p> <p>8 Q. Do you use Google Drive?</p> <p>9 A. I don't use it. I have one. I don't</p> <p>10 use it currently, no.</p> <p>11 Q. Do you know when the last time you used</p> <p>12 it was?</p> <p>13 A. Years ago.</p> <p>14 Q. Do you know what e-mail addresses you</p> <p>15 used in association with your Google Drive and your</p> <p>16 iCloud account?</p> <p>17 A. iCloud, no. Google Drive, yes.</p> <p>18 Q. Okay.</p> <p>19 MR. CAVALIER: Seth, same</p> <p>20 representation?</p> <p>21 MR. CARSON: Yeah, I think it's</p> <p>22 the e-mail account you guys already</p> <p>23 said, but yeah.</p> <p>24 MR. CAVALIER: It may well be, I</p> <p>25 just -- I mean, I didn't want to create</p>



<p>1 the issue if I didn't have to.</p> <p>2 MR. CARSON: Yeah. Same</p> <p>3 representation.</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. Did you use the Google Drive account</p> <p>6 when you were working at the Forum?</p> <p>7 A. The Gmail account?</p> <p>8 Q. The Google Drive account.</p> <p>9 A. Yes.</p> <p>10 Q. Did you search that account to</p> <p>11 determine whether it contained any documents</p> <p>12 responsive to defendant's discovery requests?</p> <p>13 A. Yes.</p> <p>14 Q. Did you find any responsive documents?</p> <p>15 A. No, I don't think so.</p> <p>16 Q. Do you use Dropbox?</p> <p>17 A. No.</p> <p>18 Q. Have you ever used Dropbox?</p> <p>19 A. Yes.</p> <p>20 Q. When was the last time you used it?</p> <p>21 A. With my lawyer.</p> <p>22 Q. Not counting that, when was the last</p> <p>23 time you used it? Nothing having to do with you or</p> <p>24 your lawyer. When was the last time you used it for</p> <p>25 nonlegal purposes?</p>	<p>Page 68</p> <p>1 you, would you still have access to it?</p> <p>2 A. Yes.</p> <p>3 MR. CAVALIER: Seth, through --</p> <p>4 I'll just ask you so that we can avoid</p> <p>5 the issue. I'm going to ask that she</p> <p>6 check to determine whether she does have</p> <p>7 that information and if so I would ask</p> <p>8 that it be produced.</p> <p>9 MR. CARSON: Yeah, if she has it,</p> <p>10 we'll give it to you, again.</p> <p>11 MR. CAVALIER: Okay.</p> <p>12 BY MR. CAVALIER:</p> <p>13 Q. Did you lose your phone in fall of</p> <p>14 2018?</p> <p>15 A. Yes.</p> <p>16 Q. Can you describe for me the</p> <p>17 circumstances surrounding that?</p> <p>18 A. I left it at a bar and when I went back</p> <p>19 to get it it was taken.</p> <p>20 Q. Was it ever found?</p> <p>21 A. No.</p> <p>22 Q. Did you ever take steps to try to</p> <p>23 recover it?</p> <p>24 A. Only using Find My Phone.</p> <p>25 Q. And was that unsuccessful?</p>
<p>Page 69</p> <p>1 A. When I was still an employee with MEF.</p> <p>2 Q. Did you store MEF documents on the</p> <p>3 Dropbox?</p> <p>4 A. Yes.</p> <p>5 Q. Did you search the Dropbox to determine</p> <p>6 whether it contained any responsive information to</p> <p>7 defendant's discovery requests?</p> <p>8 A. It was an MEF Dropbox account. I don't</p> <p>9 have access to it.</p> <p>10 Q. Okay. Did you ever have a personal</p> <p>11 Dropbox account?</p> <p>12 A. No.</p> <p>13 Q. Okay. Has Lisa Barbounis ever shared</p> <p>14 with you WhatsApp communications or chats that she's</p> <p>15 had with other people?</p> <p>16 A. I don't remember.</p> <p>17 Q. Do you remember if she's ever shared</p> <p>18 WhatsApp chats with you that she had with Danny</p> <p>19 Thomas?</p> <p>20 A. I don't remember.</p> <p>21 Q. Do you remember whether she sent you</p> <p>22 the entirety of her WhatsApp chats with Danny Thomas</p> <p>23 in 2018, 2019, and 2020?</p> <p>24 A. I don't think so.</p> <p>25 Q. If she did send that information to</p>	<p>Page 71</p> <p>1 A. Yes.</p> <p>2 Q. And what kind of phone was it that was</p> <p>3 lost?</p> <p>4 A. It was an iPhone.</p> <p>5 Q. Do you remember the date on which you</p> <p>6 lost it?</p> <p>7 A. I don't remember the exact date.</p> <p>8 Q. Can you tell me what steps you took to</p> <p>9 replace the phone?</p> <p>10 A. I went to the Verizon store and bought</p> <p>11 a new one.</p> <p>12 Q. Did they set it up for you at the</p> <p>13 Verizon store?</p> <p>14 A. Yes.</p> <p>15 Q. Do you know whether the contents of the</p> <p>16 phone were restored?</p> <p>17 A. I'm not sure what was restored and what</p> <p>18 wasn't.</p> <p>19 Q. Okay. So then is it fair to say that</p> <p>20 some things were restored but maybe not everything?</p> <p>21 A. Yes.</p> <p>22 Q. Were the photos restored?</p> <p>23 A. Some. Not all of them.</p> <p>24 Q. Okay. How about the e-mail?</p> <p>25 A. Well, e-mails attach to the accounts,</p>

<p>Page 72</p> <p>1 not the phone.</p> <p>2 Q. Okay. So you were still able to access</p> <p>3 your e-mail going back before you lost your phone.</p> <p>4 A. Correct.</p> <p>5 Q. Okay. How about text messages, were</p> <p>6 they recovered?</p> <p>7 A. I don't remember what was and what</p> <p>8 wasn't with text messages.</p> <p>9 Q. Do you remember whether your text</p> <p>10 messages with Lisa Barbounis were recovered?</p> <p>11 A. I don't remember.</p> <p>12 Q. How about other text messages, do you</p> <p>13 have any recollection as to whether some or all were</p> <p>14 recovered?</p> <p>15 MR. CARSON: Objection.</p> <p>16 THE WITNESS: I don't remember.</p> <p>17 BY MR. CAVALIER:</p> <p>18 Q. Do you remember whether the text</p> <p>19 messages -- the text messages that you had with your</p> <p>20 sister were recovered?</p> <p>21 A. I don't remember.</p> <p>22 Q. Just to be clear for the record, your</p> <p>23 sister is Megan McNulty?</p> <p>24 THE COURT REPORTER: Excuse me.</p> <p>25 Can you repeat the question? There was</p>	<p>Page 74</p> <p>1 A. I don't remember.</p> <p>2 Q. When you handed -- when you reviewed</p> <p>3 your text messages and produced some of them in</p> <p>4 response to defendant's requests for documents, did</p> <p>5 you check to see how far back they went?</p> <p>6 A. Not that I remember.</p> <p>7 Q. So it looks -- I'll represent to you</p> <p>8 that based on what we can tell from looking at the</p> <p>9 text messages it looks like some of them go back</p> <p>10 prior to the date that you lost your phone and some</p> <p>11 of them do not, and I'm just trying to figure out</p> <p>12 whether you have any idea why that is the case.</p> <p>13 A. I don't. Maybe if it was specific</p> <p>14 people, I would know, but I'm not sure which ones</p> <p>15 wouldn't go back and which ones would.</p> <p>16 Q. So your communications with Lisa</p> <p>17 Barbounis only go back to the time that you lost your</p> <p>18 phone. Do you have any idea why that is?</p> <p>19 A. I know it was around that time, it was</p> <p>20 right around the end of October, beginning of</p> <p>21 November, that Matt Bennett had erased a lot of</p> <p>22 things from my phone, text messages, and</p> <p>23 correspondence that he had and it's possible that he</p> <p>24 deleted with Lisa too.</p> <p>25 Q. Okay. But your text -- based on what</p>
<p>Page 73</p> <p>1 interference.</p> <p>2 MR. CAVALIER: Sure.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. The question for the record is, your</p> <p>5 sister's name is Megan McNulty, correct?</p> <p>6 A. Correct.</p> <p>7 Q. And to be clear again for the record,</p> <p>8 the question I'm asking is whether your text messages</p> <p>9 with your sister Megan were ever recovered after you</p> <p>10 lost your phone.</p> <p>11 MR. CARSON: Objection. Asked and</p> <p>12 answered.</p> <p>13 THE WITNESS: I don't remember.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. Do you remember whether your text</p> <p>16 messages with Gregg Roman were recovered?</p> <p>17 A. I don't remember.</p> <p>18 Q. Do you remember whether your text</p> <p>19 messages with Marnie Meyer were recovered?</p> <p>20 A. I do not.</p> <p>21 Q. Do you remember whether your text</p> <p>22 messages with Matt Bennett were recovered?</p> <p>23 A. I don't remember.</p> <p>24 Q. How about your text messages with</p> <p>25 Delaney Yonchek?</p>	<p>Page 75</p> <p>1 we can see, your texts with Matt go back to 2017. So</p> <p>2 is there any reason why -- and I'll ask you some more</p> <p>3 questions about this in a bit, but is there any</p> <p>4 reason that you can think of why Matt Bennett would</p> <p>5 delete your conversations with Lisa Barbounis from</p> <p>6 your phone but not the conversations between you and</p> <p>7 Matt?</p> <p>8 MR. CARSON: Objection. Object to</p> <p>9 form. You're asking --</p> <p>10 THE WITNESS: I don't --</p> <p>11 MR. CARSON: -- her opinion about</p> <p>12 something she said she doesn't know</p> <p>13 about right now? Is that the question?</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. You can answer.</p> <p>16 MR. CARSON: Is that -- I mean,</p> <p>17 I'm -- clarify what the question is.</p> <p>18 You're asking her opinion about the</p> <p>19 thing she said she doesn't remember,</p> <p>20 right?</p> <p>21 MR. CAVALIER: No, she said that</p> <p>22 -- when I asked her why her</p> <p>23 conversations with Lisa Barbounis only</p> <p>24 go back to the time that she lost her</p> <p>25 phone, she said that this was right</p>



<p style="text-align: right;">Page 76</p> <p>1 around the time that Matt Bennett may</p> <p>2 have deleted information from her phone,</p> <p>3 and I'm asking her why it might be that</p> <p>4 the conversations she had with Matt</p> <p>5 Bennett go back before, into 2017, but</p> <p>6 the conversations with Lisa Barbounis</p> <p>7 cut off as of that date in 2018.</p> <p>8 BY MR. CAVALIER:</p> <p>9 Q. The question is --</p> <p>10 MR. CARSON: Yeah. That's not</p> <p>11 what she said.</p> <p>12 BY MR. CAVALIER:</p> <p>13 Q. The question is, do you have any idea</p> <p>14 --</p> <p>15 MR. CARSON: She said she doesn't</p> <p>16 know; she was guessing.</p> <p>17 MR. CAVALIER: Seth, please stop</p> <p>18 testifying --</p> <p>19 MR. CARSON: She said she has no</p> <p>20 idea.</p> <p>21 MR. CAVALIER: Her answers are on</p> <p>22 the record.</p> <p>23 MR. CARSON: I'm correcting your</p> <p>24 misrepresentation of her previous</p> <p>25 testimony. Her previous testimony is</p>	<p style="text-align: right;">Page 78</p> <p>1 whether Matt Bennett deleted any communications that</p> <p>2 you had with Lisa Barbounis?</p> <p>3 A. I don't, no.</p> <p>4 Q. Did you ever speak with your sister</p> <p>5 Megan about your work at MEF?</p> <p>6 A. Not my work, no.</p> <p>7 Q. I'm not sure I understand the</p> <p>8 distinction that you're drawing there.</p> <p>9 A. I didn't talk about MEF work, donors,</p> <p>10 projects, things I was working on, no.</p> <p>11 Q. Okay. Did you speak with her about</p> <p>12 your employment at MEF?</p> <p>13 A. I spoke to her about how I was feeling</p> <p>14 at times.</p> <p>15 Q. Anything beyond how you were feeling at</p> <p>16 times?</p> <p>17 A. Just actions of other employees there</p> <p>18 and how it made me feel. That's pretty much it.</p> <p>19 Q. And how would you speak to Megan about</p> <p>20 those things?</p> <p>21 A. I mean, I was unhappy and uncomfortable</p> <p>22 with the actions that were taking place, and so I'm</p> <p>23 sure I conveyed that.</p> <p>24 Q. What methods did you use, what</p> <p>25 communication platforms did you use, to speak with</p>
<p style="text-align: right;">Page 77</p> <p>1 that she didn't know.</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. The question is, do you have --</p> <p>4 MR. CARSON: You asked her to</p> <p>5 guess.</p> <p>6 BY MR. CAVALIER:</p> <p>7 Q. For the fifth time, the question is, do</p> <p>8 you have any idea why Matt Bennett would delete text</p> <p>9 messages between you and Lisa Barbounis but not text</p> <p>10 messages between you and Matt Bennett?</p> <p>11 MR. CARSON: Objection. Form.</p> <p>12 Again, hypothetical based on something</p> <p>13 she doesn't even know happened, so go</p> <p>14 ahead, you can answer it based on that.</p> <p>15 THE WITNESS: I don't know what he</p> <p>16 deleted and what he didn't, but I --</p> <p>17 except for the fact that I know he</p> <p>18 deleted my conversation -- my text</p> <p>19 conversation with just me and him</p> <p>20 directly, so I don't have any</p> <p>21 conversations with just me and Matt</p> <p>22 Bennett on my phone.</p> <p>23 BY MR. CAVALIER:</p> <p>24 Q. Do you know -- well, let me just ask it</p> <p>25 this way. Do you know for a fact sitting here today</p>	<p style="text-align: right;">Page 79</p> <p>1 your sister about those things?</p> <p>2 A. I only ever spoke to her about those</p> <p>3 things in person --</p> <p>4 Q. You never texted --</p> <p>5 A. -- that I remember.</p> <p>6 Q. You never texted with her about those</p> <p>7 things?</p> <p>8 A. No, not that I remember.</p> <p>9 Q. Who is Neal Weinstein?</p> <p>10 A. My fiance.</p> <p>11 Q. And how long have you known Neal?</p> <p>12 A. Since August of 2018.</p> <p>13 Q. Did you ever speak with Neal about how</p> <p>14 you were feeling at MEF?</p> <p>15 A. Yes.</p> <p>16 Q. Did you ever speak with Neal about your</p> <p>17 lawsuit?</p> <p>18 A. No.</p> <p>19 Q. What methods of communication did you</p> <p>20 use when you were speaking with Neal about your</p> <p>21 feelings with respect to MEF?</p> <p>22 A. Again, we were in person.</p> <p>23 Q. Did you ever text with him about it?</p> <p>24 A. No, not about work, that I remember.</p> <p>25 Q. Did your sister ever -- did your sister</p>

<p>Page 80</p> <p>1 Megan ever send you a text message containing screen 2 shots of your conversations with Lisa Barbounis? 3 A. Not that I remember. I sent her screen 4 shots. 5 Q. And what were those -- what were those 6 screen shots of? 7 A. You just asked me about specific screen 8 shots, right? 9 Q. Yes. 10 A. Between myself and Lisa. 11 Q. Okay. And you said you sent them to 12 your sister? 13 A. Yes. 14 Q. How did you send them? 15 A. By phone, by text. 16 Q. So I'm a little confused because I 17 thought earlier when I was asking you about your 18 communications with your sister you told me that you 19 didn't text with her about the Forum or the lawsuit 20 or your feelings, that you always did that in person. 21 A. Yeah. I sent her the screen shots, we 22 didn't talk about anything else. 23 Q. Is there any particular reason why you 24 sent her the screen shots? 25 A. Because Matt was deleting things from</p>	<p>Page 82</p> <p>1 sister containing the screen shots, they would be 2 responsive, correct? 3 MR. CARSON: He's asking you 4 whether the screen shots that we 5 produced were responsive. 6 THE WITNESS: Yes. 7 BY MR. CAVALIER: 8 Q. Okay. And, to be clear, I'm asking you 9 whether the text messages that you sent to your 10 sister containing the screen shots would be 11 responsive. 12 MR. CARSON: Objection. Asked and 13 answered. 14 BY MR. CAVALIER: 15 Q. You can answer. 16 MR. CARSON: I don't -- what 17 distinction are you making? She just 18 answered that question. She literally 19 -- you just asked the same question 20 twice in a row. 21 MR. CAVALIER: No, there is a 22 distinction between what you're saying 23 and what I'm asking, Seth. The question 24 is -- 25 MR. CARSON: Okay.</p>
<p>Page 81</p> <p>1 my phone, and I thought that they were important not 2 to be deleted. 3 Q. Okay. Did you -- is there any 4 particular reason why you didn't produce those 5 messages that you sent to your sister? 6 MR. CARSON: Objection. The 7 messages were produced. 8 BY MR. CAVALIER: 9 Q. Let me ask the question this way. 10 Since you -- you read -- as you testified to earlier, 11 you read defendant's requests for production of 12 documents and you searched your text messages for 13 documents that were responsive. You would agree with 14 me, would you not, that those text messages that you 15 sent your sister containing screen shots of 16 conversations relating to Lisa Barbounis would indeed 17 be responsive, correct? 18 MR. CARSON: Objection. The 19 screen shots were produced, again, but I 20 will -- she could answer whether or not 21 they're responsive. Since they were 22 produced, I'm not sure where you're 23 going. 24 BY MR. CAVALIER: 25 Q. Those text messages that you sent your</p>	<p>Page 83</p> <p>1 BY MR. CAVALIER: 2 Q. I'll ask it this way. You've seen 3 screen shots between -- we're talking about screen 4 shots of conversations between you and Lisa 5 Barbounis; you understand that, correct? 6 A. Yes. 7 Q. And those screen shots exist as an 8 image, correct? 9 A. Correct. 10 MR. CARSON: You guys produced the 11 screen shots, too, I believe. 12 BY MR. CAVALIER: 13 Q. And at some point you're testifying 14 that you sent those screen shots to your sister 15 Megan, correct? 16 A. Correct. 17 Q. So we have the screen shots and then we 18 have the message sent to your sister containing the 19 screen shots. 20 MR. CARSON: The message is the 21 screen shots. She just said that. 22 BY MR. CAVALIER: 23 Q. So my question -- 24 MR. CARSON: It feels like you're 25 trying to trick her.</p>

<p>1 MR. CAVALIER: No.</p> <p>2 MR. CARSON: She told you she</p> <p>3 didn't -- there was nothing but the</p> <p>4 screen shots sent. The screen shots</p> <p>5 were the message. The screen shots were</p> <p>6 produced. Therefore, she's produced the</p> <p>7 screen shots that you're trying to say</p> <p>8 she didn't produce.</p> <p>9 MR. CAVALIER: I'm not trying to</p> <p>10 say anything. I'm trying to ask a</p> <p>11 question.</p> <p>12 MR. CARSON: Yeah, you said is</p> <p>13 there a reason why the screen shots</p> <p>14 weren't produced. They were produced.</p> <p>15 MR. CAVALIER: That's not what I</p> <p>16 asked.</p> <p>17 MR. CARSON: Well, you did -- that</p> <p>18 was a question a few minutes ago.</p> <p>19 BY MR. CAVALIER:</p> <p>20 Q. The question is -- well, I'll say it</p> <p>21 this way. You didn't produce the messages that you</p> <p>22 sent to your sister containing the screen shots. Do</p> <p>23 you think those --</p> <p>24 MR. CARSON: Incorrect.</p> <p>25 BY MR. CAVALIER:</p>	<p>Page 84</p> <p>1 don't want to put words in your mouth so I'll ask the</p> <p>2 question. Did you just blindly send pictures or</p> <p>3 screen shots of your communications with Lisa</p> <p>4 Barbounis to your sister without explanation or</p> <p>5 reason?</p> <p>6 A. Yes.</p> <p>7 MR. CARSON: Objection.</p> <p>8 BY MR. CAVALIER:</p> <p>9 Q. What did she say in response?</p> <p>10 A. She didn't say anything, that I</p> <p>11 remember.</p> <p>12 Q. Was there a conversation that you had</p> <p>13 with your sister in advance of sending her these</p> <p>14 screen shots so that she would know that they would</p> <p>15 be coming?</p> <p>16 A. Not that I remember.</p> <p>17 Q. Was there a conversation you had with</p> <p>18 your sister after she received the screen shots about</p> <p>19 what they were?</p> <p>20 A. I mean, we talked about, again, just</p> <p>21 bad behavior at work, but in general not -- yes.</p> <p>22 Q. So when you sent the screen shots to</p> <p>23 your sister what was her response to them?</p> <p>24 A. She didn't respond anything by text</p> <p>25 that I remember.</p> <p>Page 86</p>
<p>Page 85</p> <p>1 Q. -- messages would be responsive?</p> <p>2 MR. CARSON: Objection. Assuming</p> <p>3 facts in evidence. Incorrect statement.</p> <p>4 She did produce them.</p> <p>5 MR. CAVALIER: All right. Well,</p> <p>6 then I'll ask it this way.</p> <p>7 BY MR. CAVALIER:</p> <p>8 Q. Do you think that the text messages</p> <p>9 that you sent to your sister containing the screen</p> <p>10 shots of conversations with Lisa Barbounis are</p> <p>11 responsive to defendant's document requests?</p> <p>12 A. The text -- the screen shots are, yes.</p> <p>13 Q. So you don't think the message</p> <p>14 transmitting them to your sister is responsive?</p> <p>15 MR. CARSON: The screen shot is</p> <p>16 the message. You're talking about the</p> <p>17 same thing and trying to make it --</p> <p>18 MR. CAVALIER: Okay. Well, then</p> <p>19 let me --</p> <p>20 MR. CARSON: -- out to be two</p> <p>21 different things.</p> <p>22 MR. CAVALIER: -- let me dig into</p> <p>23 it a little more.</p> <p>24 BY MR. CAVALIER:</p> <p>25 Q. So did you just -- so what you're -- I</p>	<p>Page 87</p> <p>1 Q. She didn't say what are these, why are</p> <p>2 you sending these to me, what am I supposed to do</p> <p>3 with these?</p> <p>4 A. Not that I remember.</p> <p>5 MR. CARSON: Objection.</p> <p>6 BY MR. CAVALIER:</p> <p>7 Q. Is it a common practice for you to send</p> <p>8 screen shots of conversations that you had with other</p> <p>9 people to your sister?</p> <p>10 MR. CARSON: Objection.</p> <p>11 THE WITNESS: No.</p> <p>12 BY MR. CAVALIER:</p> <p>13 Q. Did you think it was strange that your</p> <p>14 sister didn't respond to the text messages sending</p> <p>15 the screen shots?</p> <p>16 MR. CARSON: Objection. Form.</p> <p>17 THE WITNESS: No, she knows I</p> <p>18 would tell her if she needed to know</p> <p>19 anything or if there was anything more.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. Did you instruct her on what to do with</p> <p>22 them?</p> <p>23 A. I don't remember.</p> <p>24 Q. Did you ever at any point tell her,</p> <p>25 hey, I'm sending these to you so that you can hold</p>

<p>Page 88</p> <p>1 onto them for me?</p> <p>2 A. I don't remember.</p> <p>3 Q. Did you ever tell her that you were</p> <p>4 sending them to her because you were worried that</p> <p>5 Matt Bennett was going to delete information from</p> <p>6 your phone?</p> <p>7 A. I don't remember.</p> <p>8 Q. Did you ever tell your sister to send</p> <p>9 the screen shots back to you?</p> <p>10 A. I don't remember.</p> <p>11 Q. Do you remember when you sent the</p> <p>12 screen shots to your sister?</p> <p>13 A. I don't remember.</p> <p>14 Q. So were the conversations that you had</p> <p>15 with Lisa Barbounis that were the subject of the</p> <p>16 screen shots actually deleted from your phone?</p> <p>17 A. I think so.</p> <p>18 MR. CARSON: Well --</p> <p>19 THE WITNESS: I don't remember.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. Okay. So you -- as your counsel has</p> <p>22 repeatedly said over the last couple minutes, the</p> <p>23 screen shots were produced, so how -- if you sent</p> <p>24 them to your sister and the conversations were</p> <p>25 ultimately deleted, how did you end up producing</p>	<p>Page 90</p> <p>1 minutes ago whether you ever asked your sister to</p> <p>2 send them back to you and you told me that you</p> <p>3 couldn't remember.</p> <p>4 A. Because you can get any pictures that</p> <p>5 you sent to anyone from your phone. They don't have</p> <p>6 to send them back to you. You just go in the photos.</p> <p>7 Q. So you're saying the screen shots were</p> <p>8 still in your stored photos.</p> <p>9 A. They would have been in the -- there's</p> <p>10 data between you and anyone you talk to on an iPhone.</p> <p>11 Q. So do you still then have the messages</p> <p>12 that you sent to your sister transmitting those</p> <p>13 screen shots today?</p> <p>14 A. Yes.</p> <p>15 MR. CAVALIER: I'm going to ask,</p> <p>16 Seth, that you produce those to us.</p> <p>17 MR. CARSON: Yeah, I think we did,</p> <p>18 but I'll look and if they're not</p> <p>19 produced, I'll produce it.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. Did Lisa ever ask you to send those</p> <p>22 screen shots back to her?</p> <p>23 A. I don't remember.</p> <p>24 Q. Do you remember whether you ever did,</p> <p>25 in fact, send the screen shots to Lisa?</p>
<p>Page 89</p> <p>1 those screen shots?</p> <p>2 MR. CARSON: Objection.</p> <p>3 Privilege.</p> <p>4 You can answer. It's privileged.</p> <p>5 You can answer without waiving any</p> <p>6 attorney-client privilege. The -- they</p> <p>7 were produced because she gave them to</p> <p>8 me and I gave them to you.</p> <p>9 MR. CAVALIER: Right.</p> <p>10 MR. CARSON: You guys produced</p> <p>11 them, too -- you guys produced them,</p> <p>12 too, I believe.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. The question is how --</p> <p>15 MR. CARSON: You have the screen</p> <p>16 shots that you keep asking her about.</p> <p>17 BY MR. CAVALIER</p> <p>18 Q. The question is how are they in your</p> <p>19 possession so that you can give them to your counsel?</p> <p>20 MR. CARSON: You can answer if you</p> <p>21 know.</p> <p>22 THE WITNESS: I had them from my</p> <p>23 sister. I sent them to her.</p> <p>24 BY MR. CAVALIER:</p> <p>25 Q. Right. But then I asked you a few</p>	<p>Page 91</p> <p>1 A. I don't remember.</p> <p>2 MR. CAVALIER: Seth, give me five.</p> <p>3 Okay?</p> <p>4 MR. CARSON: Yeah.</p> <p>5 MR. CAVALIER: All right.</p> <p>6 Sorry, off the record.</p> <p>7 THE VIDEO SPECIALIST: Off the</p> <p>8 record.</p> <p>9 (A brief recess was taken from</p> <p>10 11:53 a.m. to 12:05 p.m.)</p> <p>11 THE VIDEO SPECIALIST: The time is</p> <p>12 12:05 p.m. Eastern. We are back on the</p> <p>13 record.</p> <p>14 MR. CAVALIER: Okay. Ms. McNulty,</p> <p>15 I don't have any further questions for</p> <p>16 you today, but my colleague Sid Gold is</p> <p>17 going to ask you some questions from</p> <p>18 here, so that's all I have.</p> <p>19 THE WITNESS: Okay.</p> <p>20 - - -</p> <p>21 EXAMINATION</p> <p>22 BY MR. GOLD:</p> <p>23 Q. Good afternoon. I think you and I have</p> <p>24 had a meeting before when I took your deposition, and</p> <p>25 this afternoon I'm going to ask you some questions</p>



<p>Page 92</p> <p>1 regarding your relationship with Lisa Barbounis, and</p> <p>2 what I'm going to do, I'm going to show you some text</p> <p>3 messages that you and Lisa had exchanged over the</p> <p>4 years and see if I can ask some questions about those</p> <p>5 text messages.</p> <p>6 Because this deposition is being taken</p> <p>7 over Zoom, there may be situations where I may</p> <p>8 interrupt an answer that you may be giving to one of</p> <p>9 my questions, and that's not intentional on my part.</p> <p>10 I apologize in advance if I cut you off and -- I want</p> <p>11 to make sure you finish your answer.</p> <p>12 I also have a tendency to talk a little</p> <p>13 fast, so I'm deliberately trying to slow it down so</p> <p>14 that you can understand my questions and the court</p> <p>15 reporter can transcribe the testimony.</p> <p>16 Are those ground rules pretty clear?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And --</p> <p>19 MR. GOLD: Could you please put up</p> <p>20 Exhibit 1 for me?</p> <p>21 BY MR. GOLD:</p> <p>22 Q. Ms. McNulty, I'm going to ask you to</p> <p>23 take a few seconds and read this -- the exchange of</p> <p>24 text messages that you had with Lisa Barbounis back</p> <p>25 in December of 2017, and there are some portions</p>	<p>Page 94</p> <p>1 THE WITNESS: You can scroll down.</p> <p>2 THE VIDEO SPECIALIST: That number</p> <p>3 is Mr. Carson.</p> <p>4 Mr. Carson, if you are not going</p> <p>5 to object to anything, I understand that</p> <p>6 you need to at times, but in the</p> <p>7 meantime could you mute your mic?</p> <p>8 MR. CARSON: My mic is muted.</p> <p>9 Also my number doesn't end in 4848.</p> <p>10 THE VIDEO SPECIALIST: Could the</p> <p>11 number ending in 4848 either mute</p> <p>12 themselves or allow me to mute them.</p> <p>13 MR. FINK: I am muted. You can</p> <p>14 mute it on your end.</p> <p>15 MR. CARSON: If I wasn't muted,</p> <p>16 you would be hearing my three-year-old</p> <p>17 reading a book right now.</p> <p>18 THE VIDEO SPECIALIST: Understood.</p> <p>19 Thank you.</p> <p>20 MR. GOLD: Keep going.</p> <p>21 THE WITNESS: Okay.</p> <p>22 Okay.</p> <p>23 MR. MAINEN: That concludes</p> <p>24 Exhibit 1. Would you like me to keep</p> <p>25 going?</p>
<p>Page 93</p> <p>1 therein that I highlighted, and my questions are</p> <p>2 probably going to deal with the highlighted portions.</p> <p>3 MR. GOLD: So, Matt, if you can</p> <p>4 scroll down or --</p> <p>5 MR. MAINEN: Are you guys seeing</p> <p>6 all that, the highlighted text?</p> <p>7 MR. GOLD: Yeah.</p> <p>8 MR. MAINEN: Okay.</p> <p>9 THE WITNESS: Yeah.</p> <p>10 MR. GOLD: You can keep going,</p> <p>11 Matt.</p> <p>12 Go ahead, Matt, you can move</p> <p>13 quickly here.</p> <p>14 BY MR. GOLD:</p> <p>15 Q. Ms. McNulty, if you can just indicate</p> <p>16 when you're -- when you've completed reading those</p> <p>17 messages and you're ready to scroll down, just say</p> <p>18 "please scroll down."</p> <p>19 MR. MAINEN: Court reporter, can</p> <p>20 you mute number ending in 4848? It's</p> <p>21 making static.</p> <p>22 THE COURT REPORTER: Maybe the</p> <p>23 tech can do that. I'm not sure how to</p> <p>24 do that.</p> <p>25 MR. MAINEN: Okay.</p>	<p>Page 95</p> <p>1 MR. GOLD: No. Stop there.</p> <p>2 BY MR. GOLD:</p> <p>3 Q. Okay, Ms. McNulty, I just have a few</p> <p>4 questions. I guess the first question I have is, was</p> <p>5 it typical for Lisa to send you text messages when</p> <p>6 she was under the influence of drugs or narcotics?</p> <p>7 MR. CARSON: Objection. You're</p> <p>8 asking my client whether or not Lisa did</p> <p>9 drugs and then sent her messages? How</p> <p>10 would she know that?</p> <p>11 MR. GOLD: No, no, my question was</p> <p>12 is it -- is it typical for Lisa to have</p> <p>13 sent Ms. McNulty text messages while she</p> <p>14 was under the influence of drugs.</p> <p>15 MR. CARSON: Object to form.</p> <p>16 You can answer if you know.</p> <p>17 THE WITNESS: No, I think she was</p> <p>18 sick in this -- when she was referring</p> <p>19 to this, that's why she was taking</p> <p>20 anything.</p> <p>21 THE COURT REPORTER: Ms. McNulty,</p> <p>22 do you mind repeating what you just</p> <p>23 said?</p> <p>24 THE WITNESS: I said no, she was</p> <p>25 mentioning being sick when she was</p>

<p>1 taking medications, so I assume that's</p> <p>2 the reason.</p> <p>3 BY MR. GOLD:</p> <p>4 Q. And do you recall what her illness was?</p> <p>5 A. I don't, no.</p> <p>6 Q. Is that the only time you ever had a</p> <p>7 conversation with her where she revealed to you that</p> <p>8 she was under the influence of drugs or narcotics?</p> <p>9 A. That I can remember offhand, yes.</p> <p>10 Q. And do you know what the drug Percocet</p> <p>11 is?</p> <p>12 A. Not really, no.</p> <p>13 Q. You don't know that it's a painkiller?</p> <p>14 A. I was just going to say I think it's a</p> <p>15 painkiller, but --</p> <p>16 Q. Okay. And Zofran, do you know whether</p> <p>17 that's an antianxiety drug?</p> <p>18 A. I'm not sure.</p> <p>19 Q. Okay. And if you go down to the --</p> <p>20 throughout that message she's actually so high that</p> <p>21 she claims that she couldn't take a phone call from</p> <p>22 Gregg Roman. Do you read that?</p> <p>23 A. I interpreted that as because she was</p> <p>24 sick and the way she was feeling, but --</p> <p>25 Q. Well, the way -- what it says is that</p>	<p>Page 96</p> <p>1 A. Right now it's maybe like once a month.</p> <p>2 Q. Back when you were working for MEF</p> <p>3 approximately how many times did you text with Lisa</p> <p>4 Barbounis?</p> <p>5 A. Probably at least five days out of the</p> <p>6 week.</p> <p>7 Q. You mean five -- you say five days out</p> <p>8 of the week?</p> <p>9 A. Probably.</p> <p>10 Q. Not on weekends?</p> <p>11 A. I don't know what days they were, I'm</p> <p>12 just -- I think at least five out of the seven days</p> <p>13 of the week we probably texted.</p> <p>14 Q. And what percentage of those text</p> <p>15 messages occurred during work hours?</p> <p>16 A. I don't know.</p> <p>17 Q. But you would text Lisa at work,</p> <p>18 correct?</p> <p>19 A. Sometimes. It's hard to tell what's</p> <p>20 work hours and what's not considering we had flex</p> <p>21 hours.</p> <p>22 Q. Well, was Lisa Barbounis ever the --</p> <p>23 did you ever notice or witness that Lisa was under</p> <p>24 the influence of drugs when she was working for MEF;</p> <p>25 that is, working in the office?</p>
<p>Page 97</p> <p>1 she's so legit high that she can't take the call from</p> <p>2 Gregg Roman, not because she's ill.</p> <p>3 A. Well, it doesn't say that in this</p> <p>4 sentence.</p> <p>5 Q. Pardon me?</p> <p>6 A. They're separate. She was talking</p> <p>7 about the way she was feeling from the medication</p> <p>8 above that but then she was also talking about being</p> <p>9 sick and then she said that she can't talk to him</p> <p>10 like that right now, so --</p> <p>11 Q. Well, if she was sick why was she at</p> <p>12 the hairdresser? If you know.</p> <p>13 A. I don't know.</p> <p>14 Q. In terms of your interrelationship and</p> <p>15 conversations with Lisa, were there times when you</p> <p>16 thought she was not being truthful with you?</p> <p>17 A. Not that I can recall.</p> <p>18 Q. Today how would you characterize your</p> <p>19 relationship with Lisa Barbounis?</p> <p>20 A. We're friends.</p> <p>21 Q. What does that mean?</p> <p>22 A. We talk every now and again, check in</p> <p>23 on each other and see how the other one is doing.</p> <p>24 Q. How many times during the course of a</p> <p>25 week do you and Lisa text each other?</p>	<p>Page 99</p> <p>1 A. No, I didn't.</p> <p>2 Q. Did -- were you aware that Lisa</p> <p>3 Barbounis would give her prescription drugs to other</p> <p>4 employees at MEF?</p> <p>5 A. No. I don't think so.</p> <p>6 Q. Were you aware that Lisa Barbounis was</p> <p>7 taking certain drugs, prescribed drugs, while she was</p> <p>8 working for MEF?</p> <p>9 A. Yes.</p> <p>10 Q. To the best of your recollection what</p> <p>11 was she taking?</p> <p>12 A. Adderall. That's the only thing I</p> <p>13 knew.</p> <p>14 Q. Okay. Did you ever see her give any</p> <p>15 Adderall to any of her coworkers?</p> <p>16 A. I didn't see it, no.</p> <p>17 Q. And as far as -- do you know why Lisa</p> <p>18 was taking Adderall?</p> <p>19 A. I don't know the exact reason, no.</p> <p>20 Q. What do you know?</p> <p>21 A. I know she was prescribed it.</p> <p>22 Q. What?</p> <p>23 A. I know that she was prescribed it, but</p> <p>24 I don't know what her doctor prescribed it for.</p> <p>25 Q. She never told you she suffered from</p>

<p>Page 100</p> <p>1 ADD or ADHD?</p> <p>2 A. Maybe.</p> <p>3 Q. Are you saying you think she might have</p> <p>4 been or maybe she told you that?</p> <p>5 A. She might have told me that.</p> <p>6 Q. Okay. Did you have an occasion to read</p> <p>7 Lisa Barbounis's deposition in this matter?</p> <p>8 A. No.</p> <p>9 Q. Did Lisa Barbounis talk to you after</p> <p>10 her deposition in this matter?</p> <p>11 A. No.</p> <p>12 Q. When is the last time you spoke with</p> <p>13 Lisa Barbounis?</p> <p>14 A. I don't remember exactly. I would have</p> <p>15 to look. A couple weeks ago.</p> <p>16 Q. Yesterday? Would it have been</p> <p>17 yesterday?</p> <p>18 A. No.</p> <p>19 Q. The day before?</p> <p>20 A. No.</p> <p>21 Q. The day before that?</p> <p>22 A. No.</p> <p>23 Q. So you haven't spoken to her this week?</p> <p>24 A. No.</p> <p>25 Q. And how about last week?</p>	<p>Page 102</p> <p>1 you suggested that Lisa stay home from work because</p> <p>2 of her family commitments and you said that Gregg has</p> <p>3 kids, he would understand that. Do you recall that</p> <p>4 conversation at all?</p> <p>5 A. Not -- I mean, I'm reading it now, but</p> <p>6 I don't remember it, no.</p> <p>7 Q. Okay. Would it be fair to say that, at</p> <p>8 least your impression, that Gregg would accommodate</p> <p>9 an employee who needed to be out of work because they</p> <p>10 had to care for their children?</p> <p>11 A. I would hope so.</p> <p>12 Q. Okay.</p> <p>13 A. Seeing that he's a dad.</p> <p>14 Q. And did -- was there ever an occasion</p> <p>15 where you needed to have some kind of an</p> <p>16 accommodation to stay home and -- do you have</p> <p>17 children? I'm sorry. Do you have children?</p> <p>18 A. I don't yet, no.</p> <p>19 Q. Okay. But if you had to stay home and</p> <p>20 take care of your parents or whatever, there would be</p> <p>21 an accommodation for you for that I assume?</p> <p>22 A. I don't know.</p> <p>23 Q. Well, has Gregg ever -- have you ever</p> <p>24 asked for an accommodation at work where you were</p> <p>25 turned down by Gregg Roman?</p>
<p>Page 101</p> <p>1 A. No.</p> <p>2 Q. Did you -- when I say -- also I'm</p> <p>3 including text message, did you text her this week?</p> <p>4 A. No.</p> <p>5 Q. You didn't tell her you were being</p> <p>6 deposed today?</p> <p>7 A. No.</p> <p>8 MR. CARSON: I didn't tell her</p> <p>9 either.</p> <p>10 BY MR. GOLD:</p> <p>11 Q. Did you read the previous deposition</p> <p>12 that you had given in this case, ma'am?</p> <p>13 A. No.</p> <p>14 Q. Did you -- did you get a copy of it?</p> <p>15 A. No.</p> <p>16 Q. Okay.</p> <p>17 MR. GOLD: Would you please put up</p> <p>18 Exhibit 2?</p> <p>19 BY MR. GOLD:</p> <p>20 Q. Why don't you read the highlighted</p> <p>21 portions, ma'am, and then I'll ask some questions</p> <p>22 about it.</p> <p>23 A. Okay.</p> <p>24 Q. It looks like this is a text message</p> <p>25 from Lisa on January the 4th, 2018, and looks like</p>	<p>Page 103</p> <p>1 A. I don't know if I ever asked for an</p> <p>2 accommodation.</p> <p>3 Q. Do you know of any -- any employee that</p> <p>4 ever asked for an accommodation such as having to</p> <p>5 take care of their children or their parents or</p> <p>6 because they were ill who were denied such an</p> <p>7 accommodation?</p> <p>8 A. I don't know.</p> <p>9 Q. Okay.</p> <p>10 MR. GOLD: Please put up Exhibit</p> <p>11 3, please.</p> <p>12 BY MR. GOLD:</p> <p>13 Q. And read the highlighted portion.</p> <p>14 A. Okay.</p> <p>15 Q. Okay. And it's a text message that is</p> <p>16 dated February 2nd, 2018. Lisa sent the text message</p> <p>17 to you I believe. It says: I've had it with Marnie.</p> <p>18 I do not trust her.</p> <p>19 What was your understanding of the</p> <p>20 relationship that Lisa and Marnie had while working</p> <p>21 for MEF?</p> <p>22 A. I mean, I think it changed during</p> <p>23 parts, but I know that a lot of people didn't trust</p> <p>24 her when we first started working there, and I think</p> <p>25 Lisa felt that too.</p>



<p>Page 104</p> <p>1 Q. And why is that? Why didn't they trust 2 her?</p> <p>3 A. I mean, I can't speak to exactly why 4 everyone else didn't trust her. I mean, it's 5 their --</p> <p>6 Q. Well, do you know why Lisa -- 7 A. -- their thoughts.</p> <p>8 Q. How about why -- do you know why Lisa 9 didn't trust her?</p> <p>10 A. I mean, at that time we were -- one, 11 Matt was telling us not to trust Marnie, that he 12 thought that she and Gregg had a close relationship 13 and that they were --</p> <p>14 Q. They were what? 15 A. That the two of them were kind of 16 against everyone else.</p> <p>17 Q. What do you mean by that? 18 A. That they wanted to at points get Lisa 19 fired or show that she was doing things wrong even if 20 she wasn't.</p> <p>21 Q. And is this based on what Lisa told you 22 or based on your own observations?</p> <p>23 A. It was based on what Lisa told me, what 24 Marnie talked about later, what Matt talked about.</p> <p>25 Q. Why don't you tell me what Lisa told</p>	<p>Page 106</p> <p>1 A. Would have been before then, but I 2 don't --</p> <p>3 Q. Before then.</p> <p>4 A. -- again, I don't know exactly what the 5 time line was.</p> <p>6 Q. Well, you know what is meant by the 7 term at-will employment, correct? Do you know what 8 that term means?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Means you can fire somebody for 11 any reason you want, right? Correct?</p> <p>12 A. To an extent.</p> <p>13 MR. CARSON: What term are we 14 talking about --</p> <p>15 MR. GOLD: At-will employment.</p> <p>16 MR. CARSON: Okay. Thank you.</p> <p>17 BY MR. GOLD:</p> <p>18 Q. What do you mean by to an extent? 19 A. I mean, I don't think you can fire 20 people for being a female per se.</p> <p>21 Q. Well, was she fired because she was a 22 female?</p> <p>23 A. She wasn't fired.</p> <p>24 Q. Okay. So of course the -- you cannot 25 fire somebody because they're a female or whether</p>
<p>Page 105</p> <p>1 you.</p> <p>2 A. I mean, I don't remember every single 3 stage of the way. I know that --</p> <p>4 Q. Just give me what -- give me what you 5 can recall.</p> <p>6 A. I know the culmination was when Marnie 7 and her were talking about how Marnie had said that 8 Gregg had instructed Marnie to watch Lisa and tell 9 him what she was doing at all times during the day if 10 he wasn't in the office, what time she got in, what 11 time she left, and that Marnie had had a conversation 12 about possibly firing her.</p> <p>13 Q. Why was there -- Marnie had a 14 conversation with Lisa about firing Lisa or --</p> <p>15 A. No, Marnie had a conversation with -- I 16 don't remember exactly who it was, Stacey Roman and I 17 think Matt was there, too, based on what Gregg was 18 telling her.</p> <p>19 Q. When did that conversation take place 20 to the best of your recollection?</p> <p>21 A. The fall of 2018, but I don't know 22 exactly when.</p> <p>23 Q. Okay. And would that have been at or 24 about the time you had that -- the meeting with 25 Daniel Pipes?</p>	<p>Page 107</p> <p>1 they're -- because of their race or disability or 2 age, but beyond that you understand that an employer 3 can fire anybody they want at any time without any 4 warning or notice, correct?</p> <p>5 A. That is correct.</p> <p>6 MR. CARSON: Objection. Calls for 7 a legal conclusion.</p> <p>8 You can answer.</p> <p>9 BY MR. GOLD:</p> <p>10 Q. So at the time you thought that -- are 11 you telling me that Gregg Roman was going to fire 12 Lisa, is that what you're trying to tell me?</p> <p>13 A. I'm saying that there were 14 conversations that were had that Lisa found out 15 about.</p> <p>16 Q. What were the conversations? 17 A. I don't know exactly what they were. I 18 wasn't in them.</p> <p>19 Q. How do you know about them then? 20 A. Because Marnie had said that she was 21 talking to Gregg about the possibility.</p> <p>22 Q. The possibility of what? 23 A. Of firing Lisa.</p> <p>24 Q. Okay. So who revealed that to you? 25 Matt Bennett?</p>

<p>Page 108</p> <p>1 A. I don't remember exactly which one of 2 them it was first. I know they had all talked about 3 it -- the conversation happening, but I don't 4 remember who told me first.</p> <p>5 Q. Okay. So somebody told you that Gregg 6 had had a conversation with Marnie about terminating 7 Lisa sometime in the fall of 2018, correct?</p> <p>8 A. Not that he had a conversation with her 9 about firing, that he had been asking Marnie to watch 10 her and write things down if he thought -- if she was 11 doing anything wrong, he wanted her to -- or write 12 down everything that Lisa was doing throughout the 13 day so that he could find a reason to fire her.</p> <p>14 Q. And, again, that's based on -- who told 15 you that?</p> <p>16 A. I don't know who it was that told me 17 first. I know that Matt, Marnie, and Lisa had all 18 talked about it.</p> <p>19 Q. Okay. And, in fact, she was never 20 terminated, correct?</p> <p>21 A. Correct.</p> <p>22 Q. And do you know of any such notes that 23 Marnie wrote down about any surveillance of Lisa 24 Barbounis's activity at MEF?</p> <p>25 A. I don't know.</p>	<p>Page 110</p> <p>1 the same thing.</p> <p>2 BY MR. GOLD:</p> <p>3 Q. What --</p> <p>4 MR. CARSON: Just clarify.</p> <p>5 THE WITNESS: Talk about it to me?</p> <p>6 BY MR. GOLD:</p> <p>7 Q. Yeah, what -- let me just -- what I 8 understood you to say, and I'm not saying -- I may 9 have misheard you, but -- misinterpreted what you 10 said, but first said there was a conversation with 11 Matt, Marnie, Lisa, and -- about Marnie keeping 12 surveillance on Lisa --</p> <p>13 A. The conversation -- the only 14 conversation I mentioned was the conversation -- 15 sorry to interrupt. Should I let you finish 16 before --</p> <p>17 Q. Go ahead.</p> <p>18 A. -- clarifying?</p> <p>19 The only conversation I mentioned was 20 the one that I know of that happened when Marnie, 21 Stacy, and Matt were in our conference room talking 22 about the possibility of firing Lisa. The other 23 things were like one-on-one conversations where 24 Marnie had told me -- or Marnie had told Lisa and I 25 together I think, about Gregg instructing her to find</p>
<p>Page 109</p> <p>1 Q. So when you -- so were you present for 2 this conversation between Marnie, Lisa, and Matt 3 Bennett?</p> <p>4 A. I was -- I don't know if they had a 5 conversation the three of them together. I know that 6 Marnie had talked about it to Lisa and I, I know Matt 7 had talked about it happening to me, but I don't know 8 if they had the three of them a conversation 9 together.</p> <p>10 Q. Someone told you that Marnie was 11 instructed to take notes about you and see if there 12 was a reason to terminate you as well?</p> <p>13 A. No.</p> <p>14 Q. Well, you says about me. What did you 15 --</p> <p>16 A. Not that I knew of.</p> <p>17 Q. What did you mean by about me?</p> <p>18 A. I don't know what you're referring to.</p> <p>19 Q. You just said it was about me. That's 20 what I heard.</p> <p>21 A. No, I don't think I did.</p> <p>22 Q. Okay.</p> <p>23 MR. CARSON: I actually heard 24 that, too, Patricia, maybe we just 25 misunderstood what you said. I heard</p>	<p>Page 111</p> <p>1 reasons to get her fired, and Matt was a singular 2 conversation where he confirmed that -- where he was 3 telling me that Marnie had told him the same thing.</p> <p>4 Q. And when did those conversations take 5 place? Fall of 2018?</p> <p>6 A. Yes, I believe so.</p> <p>7 Q. Are we talking September? October? 8 November?</p> <p>9 A. I'm not sure exactly when it was.</p> <p>10 Q. So when you heard this news that Gregg 11 and Marnie I guess were scheming to get you fired did 12 you report that to Daniel Pipes?</p> <p>13 A. Well, it was about Lisa, not me.</p> <p>14 Q. I thought you just said that she was 15 also instructed to keep tabs on you.</p> <p>16 A. No, no one told me that.</p> <p>17 Q. Well, you just said that.</p> <p>18 A. No.</p> <p>19 Q. It's the same place we were before. 20 You said there were conversations between Matt and 21 Marnie where they were going to -- she was instructed 22 by Gregg to build a tab on Lisa to possibly get her 23 fired, then you said there's a second conversation 24 where you were the target of some surveillance by 25 Marnie.</p>

<p>Page 112</p> <p>1 A. No, I never talked about a second 2 conversation.</p> <p>3 Q. So Gregg was not trying to get you 4 fired, correct?</p> <p>5 A. I mean, at that time not that I knew.</p> <p>6 Q. Okay. So -- and, again --</p> <p>7 A. I knew he kept tabs on everybody, 8 but --</p> <p>9 Q. Well, how do you know that?</p> <p>10 A. -- that was --</p> <p>11 Q. How do you know?</p> <p>12 A. -- he would even -- he would even tell 13 me that he would look to see when people got in and 14 when they left and count how many times they went to 15 the bathroom and --</p> <p>16 Q. What's so --</p> <p>17 A. -- stuff like that.</p> <p>18 Q. What's so nefarious about that? I 19 mean, you were working there. If people are -- 20 wouldn't you want to know where people are, if 21 they're not in the office?</p> <p>22 A. But we -- one, we had flex hours, so it 23 wasn't a 9 to 5 job, it shouldn't have mattered, as 24 long as you --</p> <p>25 Q. Well --</p>	<p>Page 114</p> <p>1 Q. And you weren't fired, you left on your 2 own volition, correct?</p> <p>3 MR. CARSON: Objection.</p> <p>4 THE WITNESS: I did leave because 5 of the way I felt, yes.</p> <p>6 BY MR. GOLD:</p> <p>7 Q. And you had a job before you left MEF, 8 correct?</p> <p>9 A. I did, yes, I made sure of that.</p> <p>10 Q. You were looking for a job while you 11 were working at MEF, correct?</p> <p>12 A. Yes, because it was a place I couldn't 13 work anymore.</p> <p>14 Q. Okay. So where are you working now?</p> <p>15 A. Russell Reynolds.</p> <p>16 Q. And where were you working when you 17 left MEF?</p> <p>18 A. The same place.</p> <p>19 Q. And does Neal Goldstein work at that 20 place as well?</p> <p>21 A. Who?</p> <p>22 Q. Who is your fiance?</p> <p>23 A. No, he does not.</p> <p>24 Q. You know who Neal Goldstein is, right?</p> <p>25 A. No, Neal Weinstein is my fiance.</p>
<p>Page 113</p> <p>1 A. -- did your work and got your time in, 2 and, two, he would tell me that he would judge people 3 on if they were the first to leave in the day.</p> <p>4 Q. Let me cut to the chase. Do you know 5 whether Lisa was ever given any written warning or 6 placed on probation because she was not in attendance 7 at work on a given day or had gone to the ladies' 8 room on a given day?</p> <p>9 A. I don't know if she was or not.</p> <p>10 Q. Were you ever disciplined for going to 11 the ladies' room or not being the first one in the 12 office or the first one to leave?</p> <p>13 A. I mean, Gregg yelled about it, but --</p> <p>14 Q. My question is, were you ever 15 disciplined, were you ever put on probation, put on 16 performance improvement plan, given a last chance 17 agreement, told that you'll be fired the next time 18 you go into the ladies' room, did that ever happen to 19 you?</p> <p>20 MR. CARSON: Objection. Asked and 21 answered.</p> <p>22 BY MR. GOLD:</p> <p>23 Q. Go ahead. Answer.</p> <p>24 A. No, I was never told outright that I 25 would be fired -- but I -- no.</p>	<p>Page 115</p> <p>1 Q. Neal Weinstein. Okay. I get -- I 2 always get the names wrong. So does Neal Weinstein 3 work at that place as well?</p> <p>4 A. No, he does not.</p> <p>5 Q. What do you do for that establishment?</p> <p>6 A. I'm a project coordinator.</p> <p>7 Q. So what was your perception in the fall 8 of 2018 in terms of the relationship that Lisa had 9 with Marnie?</p> <p>10 A. I mean, it was very tumultuous until 11 they started talking to each other about what was 12 going on.</p> <p>13 Q. Well, what was going on? I mean, when 14 they started talking to each other about starting a 15 lawsuit or what is it that was going on?</p> <p>16 A. No, I know that they -- there was 17 little trust until they got into a fight in the 18 office one day and Gregg had told Lisa to file a 19 complaint against Marnie and then separately told 20 Marnie to do the same thing to Lisa but also told 21 Marnie that he didn't know anything about that, and 22 the two of them started talking about what Gregg had 23 said and how he had lied to each of them in that way 24 and then they started figuring out how he was playing 25 each of them, and then the relationship was better.</p>

<p>Page 116</p> <p>1 Q. Were those actions -- assuming Gregg 2 did that, which I'm not -- I don't know whether 3 that's truthful or not. Even if he had, you would 4 agree that wasn't sex discrimination, correct? 5 MR. CARSON: Objection. 6 You can answer. 7 THE WITNESS: I don't know why he 8 was doing it. 9 BY MR. GOLD: 10 Q. Okay. Did you ask him? 11 A. No. 12 Q. Well, did you bring these issues up 13 when you met with Daniel Pipes in November of 2018? 14 A. I didn't bring up the fight between 15 Lisa and Marnie. That was theirs, it wasn't mine. 16 Q. Okay. And you could have brought it up 17 if you wanted to, correct? 18 A. Yes, but I knew that they were talking 19 to him about it. 20 Q. You knew they were talking to Daniel 21 Pipes about it? 22 A. Yes. 23 Q. Okay. And do you know when those 24 conversations took place? 25 A. The beginning of November 2018. I</p>	<p>Page 118</p> <p>1 BY MR. GOLD: 2 Q. Do you know if -- 3 MR. CARSON: There's no question 4 that's pending. 5 BY MR. GOLD: 6 Q. -- anybody -- was anybody at MEF ever 7 fired for complaining about Gregg Roman? 8 A. Not while I was there, but we were told 9 -- we were made to believe that the threat was there 10 and because of the things he said and told us and -- 11 Q. Okay. So the answer is no -- 12 A. -- he told us -- 13 Q. -- correct? During your tenure at -- 14 MR. CARSON: Objection. 15 BY MR. GOLD: 16 Q. During your tenure at MEF was anyone 17 ever fired because of a complaint they made about 18 Gregg Roman? 19 A. No. 20 Q. Now, when did you tell Marnie about 21 Matt? 22 A. I don't remember exactly when it was. 23 Q. It would have been -- would not have 24 been in the fall of 2018, would have been later? 25 A. I told her something about a</p>
<p>Page 117</p> <p>1 don't know the exact date. 2 Q. Okay. Now, Marnie as I understand it 3 -- was she the head of HR? 4 A. Correct. 5 Q. Did Marnie ever -- best of your 6 knowledge did -- did you ever go to Marnie to 7 complain about anything that was happening in the 8 workplace since she was HR? 9 A. I told her a few things that had 10 happened with Matt later on, but, again, for a good 11 portion of the beginning Matt -- we thought Matt was 12 our friend and he was telling us not to trust her and 13 that it wasn't a true HR, that she wouldn't use 14 anything we told her to help us, that she would just 15 help Gregg to get us fired. 16 Q. Nobody got fired, though, so what are 17 you talking about? 18 MR. CARSON: Objection. 19 BY MR. GOLD: 20 Q. It seems like a lot of the -- it seems 21 like you -- you seem to have interpreted a lot of 22 things that Gregg did or perhaps others did there as 23 being calculated to get someone fired. Nobody was 24 ever fired. 25 MR. CARSON: Objection.</p>	<p>Page 119</p> <p>1 conversation, an uncomfortable conversation that had 2 happened in the winter of 2018 I remember. 3 Q. Okay. 4 A. And then everything would have been 5 later after that. 6 Q. Would that have occurred sometime in 7 March of 2018? 8 A. March -- no. 9 Q. I'm sorry, March of 2019. 10 A. Would what have happened in March of -- 11 Q. When you went to -- when you went to 12 Marnie to complain about Matt. 13 A. I told you -- I mentioned something in 14 December of 2018. 15 Q. And what about thereafter? 16 A. I don't think I said anything until 17 after he had left because nothing -- nothing 18 happened. 19 Q. Okay. He left in March of 2019? 20 A. Yes. 21 Q. And you were at his going away party at 22 the Continental, correct? 23 A. We went to lunch, yes. 24 Q. Well, didn't you invite Matt to the 25 Continental for the going away party?</p>



<p>Page 120</p> <p>1 A. It wasn't a going away party, it was a</p> <p>2 last lunch, and I don't know who invited -- who came</p> <p>3 up with the idea or --</p> <p>4 Q. Last lunch for who?</p> <p>5 A. For Matt.</p> <p>6 Q. Okay. So instead of a going away</p> <p>7 party, it was a last lunch party, right?</p> <p>8 A. It wasn't exactly a party, it was just</p> <p>9 a lunch.</p> <p>10 Q. Well, didn't you ask Matt about getting</p> <p>11 a job at the -- at ZOA?</p> <p>12 A. I did not, no.</p> <p>13 Q. You did not.</p> <p>14 MR. GOLD: Could you put up</p> <p>15 Exhibit 65 for me, Matt?</p> <p>16 MR. MAINEN: Yeah, sure, it's</p> <p>17 going to take about 30 seconds to get</p> <p>18 that up, so --</p> <p>19 MR. GOLD: Okay. That's fine.</p> <p>20 MR. MAINEN: I'll do that now.</p> <p>21 MR. GOLD: Okay. Great.</p> <p>22 And if the witness needs to take a</p> <p>23 break, just let me know. I'm not trying</p> <p>24 to -- you have a right to take a break</p> <p>25 if you need a break.</p>	<p>Page 122</p> <p>1 BY MR. GOLD:</p> <p>2 Q. While we're waiting, during that time</p> <p>3 period of November 2018 did Marnie ever complain to</p> <p>4 you about Gregg Roman?</p> <p>5 A. I don't remember.</p> <p>6 Q. Did Lisa ever share with you her</p> <p>7 thoughts about Marnie's relationship with Gregg in</p> <p>8 November 2018?</p> <p>9 A. In November of 2018?</p> <p>10 Q. Yeah.</p> <p>11 A. I don't think so.</p> <p>12 Q. Was there a point in time when Lisa did</p> <p>13 share her thoughts about Marnie's relationship with</p> <p>14 Gregg?</p> <p>15 A. Just that they were -- in the beginning</p> <p>16 anyway that they were close and --</p> <p>17 Q. Well, Gregg was the director and Marnie</p> <p>18 was the head of HR, correct?</p> <p>19 A. Correct.</p> <p>20 Q. So what you mean by close, I mean, they</p> <p>21 were coworkers?</p> <p>22 A. That they were very friendly.</p> <p>23 Q. Okay. They were what friendly?</p> <p>24 A. I'm sorry, what was that?</p> <p>25 Q. You said friendly, what was the word</p>
<p>Page 121</p> <p>1 THE WITNESS: Okay.</p> <p>2 MR. CARSON: Sidney, just to let</p> <p>3 you know, Patricia is actually eight</p> <p>4 months pregnant right now.</p> <p>5 MR. GOLD: Oh, really? Great.</p> <p>6 Congratulations. I hope everything is</p> <p>7 working out well.</p> <p>8 THE WITNESS: Thank you.</p> <p>9 MR. GOLD: Girl or boy, don't you</p> <p>10 know yet?</p> <p>11 THE WITNESS: It's a girl.</p> <p>12 MR. GOLD: You're lucky. Although</p> <p>13 they say boys love their moms more than</p> <p>14 their dads. I can attest to that. And</p> <p>15 I think Seth can, too.</p> <p>16 MR. CARSON: I probably can, yeah.</p> <p>17 Me and my mother are pretty close.</p> <p>18 MR. GOLD: Are you in your eighth</p> <p>19 month, I take it, or nine -- down to the</p> <p>20 wire or --</p> <p>21 THE WITNESS: I'm eight months.</p> <p>22 MR. GOLD: Okay. Great.</p> <p>23 MR. MAINEN: All right. I'll be</p> <p>24 sharing my screen now of Exhibit 65.</p> <p>25 MR. GOLD: Thank you.</p>	<p>Page 123</p> <p>1 before friendly, I couldn't hear that.</p> <p>2 A. Very friendly.</p> <p>3 Q. Very friendly. Okay. Very friendly in</p> <p>4 terms of socializing together or very friendly in</p> <p>5 terms of work?</p> <p>6 A. Work and a kinship outside of work I</p> <p>7 think.</p> <p>8 Q. What do you know about their</p> <p>9 relationship outside of work?</p> <p>10 A. I don't know much about their</p> <p>11 relationship outside of work.</p> <p>12 Q. So why did you just say they had a</p> <p>13 relationship outside of work?</p> <p>14 A. I think -- well, Matt told us anyway</p> <p>15 for a long time in the beginning that Marnie and</p> <p>16 Gregg were close friends and that anything that was</p> <p>17 said to Marnie would really just go straight to</p> <p>18 Gregg.</p> <p>19 Q. And that's Matt again. Did he give you</p> <p>20 any examples of that when he made that statement?</p> <p>21 A. I don't remember.</p> <p>22 Q. All right. Let's go now to 65. Why</p> <p>23 don't you read the various -- the text message</p> <p>24 exchange and -- just so you know, this -- I believe</p> <p>25 <u>these text messages were exchanged at the Continental</u></p>

<p>Page 124</p> <p>1 during that last luncheon for Matt. I'm sorry, it 2 was after the luncheon with Matt. 3 A. Okay. 4 MR. GOLD: Do you want to scroll 5 down, Matt? 6 THE WITNESS: Okay. 7 MR. GOLD: Okay. Scroll down. Is 8 that it? Keep going. 9 THE WITNESS: Okay. 10 MR. GOLD: Is that it, Matt? No. 11 Keep going. 12 THE WITNESS: Okay. The yellow -- 13 sorry. Are we just going to the yellow 14 or keep going? 15 BY MR. GOLD: 16 Q. And, by the way, which is your phone 17 number there, Ms. McNulty? 18 A. The one ending in 1968. 19 Q. Okay. 20 A. Okay. 21 Okay. 22 MR. MAINEN: Hey, Sid, that 23 concludes the messages on March 8th. 24 MR. GOLD: Okay. 25 BY MR. GOLD:</p>	<p>Page 126</p> <p>1 Q. Okay. And from what I gather from this 2 text -- these text messages, I guess -- not to make 3 it into a primary fight, was she running against 4 Marnie for that position so to speak? 5 A. It was -- it could have been any one of 6 us. 7 Q. Okay. Well, did Marnie expect to be 8 the person so designated? 9 A. I'm not sure if -- I guess reading from 10 those she expected to be, reading from what she 11 mentioned to Lisa, but I didn't know that at the 12 time. 13 Q. Why wasn't Marnie at that luncheon, if 14 you know? 15 A. I don't know. 16 Q. If you look at the yellow entry, it 17 looks like you said: Whatever, Matt told me 18 yesterday was shit talking up a storm when they were 19 in their offices with the door closed. Telling 20 Daniel that it's like an episode of survival in the 21 office -- 22 I guess you meant Survivor, right? 23 A. Yes. 24 Q. -- and we're all walking around trying 25 not to make eye contact with her --</p>
<p>Page 125</p> <p>1 Q. So, Ms. McNulty, I had suggested that 2 this -- the text messages were exchanged after the 3 luncheon at the Continental. I want to be clear, I 4 don't want to suggest that, but do you have any 5 recollection as to whether it was before or after the 6 luncheon? 7 A. I think it was after. 8 Q. Okay. And who was attendance at that 9 particular -- at the luncheon? 10 A. I think it was Matt, Lisa, myself, 11 Caitriona, and Delaney. 12 Q. And Marnie was not present? 13 A. I don't think so. 14 Q. There is some discussion here about a 15 vote that was taken. Do you have a recollection 16 about that? 17 A. Yes. 18 Q. Tell me about that, please. 19 A. Daniel wanted to appoint somebody as 20 head of the office with Matt gone, and he asked us -- 21 he said he didn't want to make the decision himself, 22 and so he asked us each to vote for someone 23 anonymously and let him know our choice. 24 Q. And who was that? 25 A. Lisa was voted.</p>	<p>Page 127</p> <p>1 I guess meaning Marnie, correct? 2 A. Yes. 3 Q. -- because we all know we did wrong 4 "voting against her." 5 Could you tell me what you meant by 6 that text message? 7 A. It was just what Matt had told me. 8 Q. And -- I'm not sure I understand. Can 9 you tell me what you understood that -- what Matt 10 said to you? 11 A. I was only repeating what he had told 12 me that he heard through the wall from Daniel -- 13 Daniel's office in a conversation with Daniel and 14 Marnie that she was upset about the office dynamics 15 at the moment. 16 Q. So at least until March of 2019 this 17 tension that had existed between Lisa and Marnie 18 seems to still be pretty intense in March of 2019; 19 would that be accurate? 20 A. It looked like it was then, yes. 21 Q. And when you say someone to be head of 22 the office, were you talking about someone who would 23 be a point person of sorts between the employees and 24 Daniel Pipes? 25 A. He didn't end up appointing anyone in</p>

<p style="text-align: right;">Page 128</p> <p>1 the end, he just took it all back, so I'm -- we never</p> <p>2 actually knew what the exact details of what the</p> <p>3 person would do, if it was just kind of managing the</p> <p>4 office and the people in there or if it was reporting</p> <p>5 back to him, I'm not sure.</p> <p>6 Q. Let me understand this then. You had</p> <p>7 this election, you went to the Continental, Lisa was</p> <p>8 chosen over Marnie, and then you're saying it was --</p> <p>9 it never happened?</p> <p>10 A. It never happened.</p> <p>11 Q. And how do you know that?</p> <p>12 A. Because Daniel told us that he wasn't</p> <p>13 going to select anybody.</p> <p>14 Q. Okay. And at that point is that when</p> <p>15 -- if I'm not mistaken, according to my time line,</p> <p>16 Gregg was invited back to the office, correct?</p> <p>17 A. It was in March of 2019. I don't know</p> <p>18 exactly when it was.</p> <p>19 Q. Well, when did --</p> <p>20 A. Yeah, I think it was around the same.</p> <p>21 Q. It looks like this text message is</p> <p>22 dated March 8th, 2019.</p> <p>23 A. It was around the same time that Matt</p> <p>24 left, so, yes, I guess.</p> <p>25 Q. Okay. So Matt left, and do you know</p>	<p style="text-align: right;">Page 130</p> <p>1 back or called him in response to a message. I don't</p> <p>2 remember.</p> <p>3 Q. Okay. But then you remember speaking</p> <p>4 with him in -- after September 2019?</p> <p>5 A. No.</p> <p>6 Q. Well, you just -- you said you spoke to</p> <p>7 him after September -- after you left.</p> <p>8 A. No, after he left. Not after I left.</p> <p>9 Q. After Matt -- okay. So you don't</p> <p>10 recall having any conversations with Matt after he</p> <p>11 left up until the point in time when you left,</p> <p>12 correct?</p> <p>13 A. No, I do remember having conversations</p> <p>14 with him after he left.</p> <p>15 Q. Okay. What did he tell you --</p> <p>16 A. Not after I left.</p> <p>17 Q. I'm sorry. I misunderstood. Apology.</p> <p>18 What did he tell you in those</p> <p>19 conversations?</p> <p>20 A. There was a conversation where he told</p> <p>21 me about Gregg calling him and being upset about</p> <p>22 another accusation being made against him in the</p> <p>23 office, and they were trying to figure out what the</p> <p>24 accusation could have been or who it was made by, and</p> <p>25 there was a conversation that I remember where he</p>
<p style="text-align: right;">Page 129</p> <p>1 why Matt left?</p> <p>2 A. He took another job.</p> <p>3 Q. And you have no recollection of asking</p> <p>4 Matt whether there was a position for you in that</p> <p>5 other job, correct?</p> <p>6 A. I do not, no.</p> <p>7 Q. Did you have any conversations with</p> <p>8 Matt after he left MEF?</p> <p>9 A. Yes.</p> <p>10 Q. When?</p> <p>11 A. I don't know exactly when. I know he</p> <p>12 had called me a few times after he left to tell me</p> <p>13 things that were happening at MEF that he found out</p> <p>14 about through Gregg.</p> <p>15 Q. When was that conversation?</p> <p>16 A. I don't know exactly when they were.</p> <p>17 Q. Would it have been before you left MEF?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And you left when?</p> <p>20 A. September of 2019.</p> <p>21 Q. So from the point in time March until</p> <p>22 September did you place any phone calls to Matt after</p> <p>23 he left?</p> <p>24 A. I don't remember. I know he called me</p> <p>25 a few times. I don't remember if I ever called him</p>	<p style="text-align: right;">Page 131</p> <p>1 called me to tell me he had heard somebody had</p> <p>2 returned back, had been hired back, and that he had</p> <p>3 also heard that the -- that they were going to hire</p> <p>4 for a new director of development, his old position,</p> <p>5 and that that job description was being made.</p> <p>6 Q. And if I'm not mistaken, that was a</p> <p>7 position that you had wanted, correct?</p> <p>8 A. At that time, correct.</p> <p>9 Q. You were the acting director?</p> <p>10 A. Correct, at that time.</p> <p>11 Q. And who was it that was hired back, do</p> <p>12 you know?</p> <p>13 A. It was Gary. I can't think of his last</p> <p>14 name right now.</p> <p>15 Q. Was he hired before you had left?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And how did you feel about that?</p> <p>18 A. I didn't -- about him being hired back?</p> <p>19 Q. Yeah, about Gary getting the job versus</p> <p>20 you.</p> <p>21 A. No, he didn't get that job, he was just</p> <p>22 hired back to MEF.</p> <p>23 Q. So no one became the -- what -- the</p> <p>24 director of development before you left.</p> <p>25 A. No, they were -- they were actively</p>



<p>1 looking to hire but not -- no one was hired before I 2 left.</p> <p>3 Q. Okay. And did you apply for that job 4 as well?</p> <p>5 A. I did.</p> <p>6 Q. So we're up to March of 2019 where this 7 relationship between Marnie and Lisa at best appears 8 to be somewhat strained, and I think you testified 9 that at some point their relationship took a turn for 10 the better. Do you know when that was?</p> <p>11 A. I mean, they had a good relationship 12 before this argument about the office point and they 13 were fine afterwards, too, as far as I know.</p> <p>14 Q. Okay. So even though I believe in this 15 -- these text messages there is evidence that Marnie 16 was quite angry that she wasn't selected for that 17 position and Lisa was, you're telling me the 18 relationship between them was still quite good?</p> <p>19 A. Yeah, didn't -- they didn't stay upset 20 with each other for very long. Especially since --</p> <p>21 Q. Now, Gregg Roman was out of the office 22 between November 2018 and March 2019, correct?</p> <p>23 A. Correct.</p> <p>24 Q. And at that juncture he was no longer 25 in a supervisory role, correct?</p>	<p>Page 132</p> <p>1 Q. Okay. And isn't it true that there 2 were tensions between Marnie and Lisa during the time 3 when Gregg Roman was out of the office between March 4 of 2019 -- I'm sorry, between November of 2018 and 5 March of 2019?</p> <p>6 A. I don't know when exactly their 7 tensions were --</p> <p>8 Q. Do you have any recollection -- do you 9 have any idea what the relationship was between Lisa 10 and Marnie during that time period of November 2018 11 and March 2019?</p> <p>12 A. I don't remember.</p> <p>13 Q. Were there any -- you say you can't 14 remember -- you don't remember when their -- when 15 they had these tensions or -- what is it you don't 16 remember?</p> <p>17 A. Yeah, I don't remember when they had 18 their tensions. I mean, they were short-lived, but I 19 don't remember when they were.</p> <p>20 Q. Based on your observations, what do you 21 think the problem was between Marnie and Lisa, if you 22 know?</p> <p>23 A. I don't know.</p> <p>24 MR. GOLD: Okay. Let's go back to 25 exhibit -- let's go to Exhibit 4.</p> <p>Page 134</p>
<p>Page 133</p> <p>1 A. He was still in a senior position but 2 not in a I guess you could say supervisory role, even 3 though --</p> <p>4 Q. He was not in a --</p> <p>5 A. -- he did still supervise our work.</p> <p>6 Q. Okay. He was not in a supervisory 7 role, correct?</p> <p>8 THE COURT REPORTER: I apologize. 9 I didn't hear the end of that answer.</p> <p>10 MR. GOLD: I'm sorry. Go ahead.</p> <p>11 THE WITNESS: Where I said he 12 still supervised our work?</p> <p>13 BY MR. GOLD:</p> <p>14 Q. You're saying what -- during the period 15 of November 2018 to March of 2019 he was supervising 16 your work?</p> <p>17 A. Yes, he was telling us what we needed 18 to do, when we needed to do it by, if he needed -- if 19 it -- we needed to do more, if it wasn't done well or 20 needed to be done again, he was still telling us all 21 those things, yes.</p> <p>22 Q. He was not in the office, though, 23 correct?</p> <p>24 A. He was not in the office during that 25 time, no.</p>	<p>Page 135</p> <p>1 BY MR. GOLD:</p> <p>2 Q. I mean, Lisa -- one thing we do know 3 that as of February 2018 Lisa said I had it with 4 Marnie and I don't trust her. You recall that, 5 correct?</p> <p>6 A. I don't remember if that was the date, 7 but I remember --</p> <p>8 Q. That's the date of the text message 9 that I just showed you, Exhibit 3.</p> <p>10 A. Weren't we just looking at text 11 messages from March?</p> <p>12 Q. We're now moving back to Exhibit 3.</p> <p>13 MR. GOLD: Could you put that on 14 the board?</p> <p>15 THE WITNESS: I don't remember the 16 date that --</p> <p>17 MR. GOLD: Yeah, let's put that -- 18 yeah, we're off the one from the 19 Continental, now we're back to the one 20 from Exhibit 3 from February 2nd, 2018. 21 Are you there, Matt?</p> <p>22 MR. MAINEN: Yeah, I'm putting it 23 up right now.</p> <p>24 MR. GOLD: All right.</p> <p>25 BY MR. GOLD:</p>

<p>Page 136</p> <p>1 Q. And do you see the date of that --</p> <p>2 these text messages, they were February 1st, 2018?</p> <p>3 A. Uh-huh.</p> <p>4 Q. February 2nd, 2018. Lisa says: I've</p> <p>5 had it with Marnie. I do not trust her. I told her</p> <p>6 about the thing with Gregg and she went right to Matt</p> <p>7 to see if he knew. Like why talk about it? I</p> <p>8 fucking told you it happened. But I can't say</p> <p>9 anything because it would throw Matt under the bus.</p> <p>10 Why was she even -- do you know why she</p> <p>11 was concerned about throwing Matt under the bus?</p> <p>12 A. I mean, at that time we thought Matt</p> <p>13 was our biggest advocate, always looking out for us</p> <p>14 and --</p> <p>15 Q. Well, if that's true, then why would</p> <p>16 you -- why would she be talking about throwing Matt</p> <p>17 under the bus because he went right to -- rather,</p> <p>18 Marnie went right to Matt?</p> <p>19 MR. GOLD: Scroll down.</p> <p>20 THE WITNESS: I'm not sure what --</p> <p>21 what the question is.</p> <p>22 MR. GOLD: Yeah.</p> <p>23 BY MR. GOLD:</p> <p>24 Q. Well, she says -- you say to her: Yo.</p> <p>25 Agreed. And if you're gonna preach about how HR</p>	<p>Page 138</p> <p>1 She says: I have a bad habit of taking</p> <p>2 things as a direct assault.</p> <p>3 You respond: Yeah, I know the feeling,</p> <p>4 but I would just take --</p> <p>5 A. Yeah, about taking things as a direct</p> <p>6 assault, not about being paranoid.</p> <p>7 Q. Well, direct -- well -- okay. Talking</p> <p>8 to Marnie -- I think she -- she conceded that she</p> <p>9 thought her relationship with Marnie there were some</p> <p>10 -- any actions Marnie took against her was a direct</p> <p>11 assault. Would you agree with that?</p> <p>12 A. I don't think Marnie took any actions</p> <p>13 against her.</p> <p>14 Q. Well, you say: I know the feeling.</p> <p>15 What were you -- what were you</p> <p>16 referring to?</p> <p>17 A. About taking things as a direct result,</p> <p>18 didn't even have anything to do with work, just that</p> <p>19 I can relate to that feeling.</p> <p>20 Q. You're just talking generally about</p> <p>21 life in general?</p> <p>22 A. Yeah.</p> <p>23 Q. Well, you say here: Yeah, I know the</p> <p>24 feeling, haha, but I would just take this as a live</p> <p>25 and learn experience, can't talk about everything</p>
<p>Page 137</p> <p>1 works.</p> <p>2 Lisa says: Exactly.</p> <p>3 And then you say: I will never vent to</p> <p>4 her about work things ever again, I honestly even</p> <p>5 talk about good, no work talk with her. I feel like</p> <p>6 things get misconstrued or she goes straight to Gregg</p> <p>7 with it.</p> <p>8 So it's pretty clear you had a pretty</p> <p>9 bad relationship with Marnie as well, or you had lost</p> <p>10 trust with Marnie, correct?</p> <p>11 A. Yes, at that time, Matt was telling us</p> <p>12 --</p> <p>13 Q. And you began to lose trust with Matt,</p> <p>14 right?</p> <p>15 A. Much later, yeah.</p> <p>16 MR. GOLD: Scroll down.</p> <p>17 BY MR. GOLD:</p> <p>18 Q. And you say -- she said to you: I have</p> <p>19 a bad habit of taking things as a direct assault.</p> <p>20 Would you agree that Lisa was a little</p> <p>21 bit paranoid about Marnie?</p> <p>22 A. I don't know if she was paranoid about</p> <p>23 Marnie. I don't know.</p> <p>24 Q. Do you know what she means by -- well,</p> <p>25 you say: Yeah, I know the feeling.</p>	<p>Page 139</p> <p>1 with everyone and now you have a better idea of where</p> <p>2 those boundaries lie there.</p> <p>3 And then she responds: I don't know</p> <p>4 why this made me think of you.</p> <p>5 MR. GOLD: And then keep going</p> <p>6 down. We're now into Exhibit 4. So</p> <p>7 let's -- why don't you take a -- put</p> <p>8 Exhibit 4 up there and let's have her</p> <p>9 please read that, the highlighted</p> <p>10 portion.</p> <p>11 THE WITNESS: Okay.</p> <p>12 MR. GOLD: Keep going. Is that</p> <p>13 the end of it?</p> <p>14 THE WITNESS: Okay.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. So do you recall the context in which</p> <p>17 this conversation took place back in February of</p> <p>18 2018?</p> <p>19 A. That's when Lisa found out that Marnie</p> <p>20 was being instructed to watch her and take notes on</p> <p>21 her.</p> <p>22 Q. Well, you're the one who say, well,</p> <p>23 she's like your babysitter, correct?</p> <p>24 A. I questioned. That's a question.</p> <p>25 Q. Why did you say that?</p>

<p style="text-align: right;">Page 140</p> <p>1 A. Because that's not normal workplace 2 environmental action.</p> <p>3 Q. So why didn't you go make a complaint 4 to Daniel Pipes?</p> <p>5 A. We had been told a lot of things in the 6 beginning about complaining to different people, one 7 we were told not to talk to Daniel at all.</p> <p>8 Q. Who told you that? Who told you that?</p> <p>9 A. Gregg had told us that.</p> <p>10 Q. When?</p> <p>11 A. Within the first month of working 12 there. That everything was to go through --</p> <p>13 Q. And how did that come about?</p> <p>14 A. He just told us flat out that we should 15 never be talking to Daniel or e-mailing Daniel 16 without, one, at minimum he should be cc'd if it was 17 an e-mail, and that he was the boss. I mean, I think 18 we've talked about all this before, but that -- that 19 he was the head honcho and that nothing was to go 20 above him.</p> <p>21 Q. But eventually in November you did have 22 conversations with Daniel Pipes, correct?</p> <p>23 A. Correct.</p> <p>24 Q. So you -- whatever may have been said, 25 you did it anyway in November 2018, you met with</p>	<p style="text-align: right;">Page 142</p> <p>1 and the same thing would happen to us and everybody 2 would just defend Gregg and --</p> <p>3 Q. Tiffany Lee filed a complaint with the 4 Pennsylvania Commission, she had a lawyer, and she 5 withdrew the case. So have you had any conversations 6 with Tiffany Lee within the last two, three years?</p> <p>7 MR. CARSON: Objection. What you 8 said is absolutely false, but you can 9 continue --</p> <p>10 MR. GOLD: That is true. She 11 withdrew her claim. She didn't get a 12 nickel.</p> <p>13 MR. CARSON: Not true.</p> <p>14 MR. GOLD: It is true. Call Kevin 15 Lovitz. You'll find out.</p> <p>16 BY MR. GOLD:</p> <p>17 Q. So tell me --</p> <p>18 MR. CARSON: Yeah --</p> <p>19 BY MR. GOLD:</p> <p>20 Q. -- what -- what is it -- what is it you 21 know --</p> <p>22 MR. CARSON: -- I know exactly 23 what happened because --</p> <p>24 MR. GOLD: You were probably --</p> <p>25 MR. CARSON: -- our firm</p>
<p style="text-align: right;">Page 141</p> <p>1 Daniel Pipes.</p> <p>2 A. He came to my office, which is how the 3 first time I told him about any of this, yes.</p> <p>4 Q. Well, instead of -- did you ever go to 5 Marnie and complain as -- since she was the head of 6 HR if you had any complaints?</p> <p>7 A. Again, like the -- like you're showing 8 in these text messages, we were told that -- by Matt, 9 again, that HR just tells exactly what happens to 10 everyone.</p> <p>11 Q. You could have taken a pad of paper and 12 written a complaint to anybody you wanted, you could 13 have written it to Matt, correct?</p> <p>14 A. Matt had also told us about what had 15 happened to Tiffany Lee and had warned us against --</p> <p>16 Q. What year was that?</p> <p>17 A. That he told me or that Tiffany Lee --</p> <p>18 Q. No, when was Tiffany Lee working for 19 MEF?</p> <p>20 A. I don't know the exact dates. I know 21 it was -- that's how he got his job position, because 22 he took over for her when she left.</p> <p>23 Q. Yeah.</p> <p>24 A. But he had warned us that she had 25 complained and everyone was told to lie against her</p>	<p style="text-align: right;">Page 143</p> <p>1 represented her --</p> <p>2 MR. GOLD: -- representing her --</p> <p>3 THE COURT REPORTER: I can't hear 4 anybody. I can't hear anybody.</p> <p>5 MR. GOLD: Seth, were you 6 representing Tiffany Lee?</p> <p>7 MR. CARSON: Our firm did.</p> <p>8 MR. GOLD: Okay. What did she 9 recover?</p> <p>10 MR. CARSON: I don't think that's 11 the point. She never withdrew any 12 claims.</p> <p>13 MR. GOLD: She filed a complaint 14 with the commission. That's true, 15 correct?</p> <p>16 MR. CARSON: She filed with the 17 EEOC, she filed --</p> <p>18 MR. GOLD: Right?</p> <p>19 MR. CARSON: -- a right to sue 20 letter and decided not to pursue claims 21 in federal court. That is not 22 withdrawing claims.</p> <p>23 MR. GOLD: So did she ever pursue 24 a claim ever beyond that?</p> <p>25 MR. CARSON: It's my understanding</p>

<p>1 that she decided not to pursue the</p> <p>2 claims in federal court, and I have no</p> <p>3 idea why --</p> <p>4 MR. GOLD: Okay. Let's come back</p> <p>5 --</p> <p>6 BY MR. GOLD:</p> <p>7 Q. When did you --</p> <p>8 MR. CARSON: She never withdrew</p> <p>9 anything. She never --</p> <p>10 BY MR. GOLD:</p> <p>11 Q. Ms. McNulty, when was the last time --</p> <p>12 did you ever have a conversation with Tiffany Lee in</p> <p>13 your lifetime?</p> <p>14 A. No, I haven't.</p> <p>15 THE COURT REPORTER: Excuse me. I</p> <p>16 didn't -- did you ever have a</p> <p>17 conversation with Tiffany Lee -- what</p> <p>18 was the end of it?</p> <p>19 MR. GOLD: In her life -- in your</p> <p>20 lifetime.</p> <p>21 THE COURT REPORTER: And what was</p> <p>22 the answer?</p> <p>23 MR. GOLD: No.</p> <p>24 THE WITNESS: No.</p> <p>25 BY MR. GOLD:</p>	<p>Page 144</p> <p>1 THE WITNESS: He had told me</p> <p>2 exactly how lawyers had come in and</p> <p>3 talked to him and he was instructed to</p> <p>4 lie about it and that everyone else</p> <p>5 would do the same and it was -- that</p> <p>6 there was no point and I would be the</p> <p>7 one to leave in the end if I said</p> <p>8 anything, so, yeah, it was very</p> <p>9 daunting.</p> <p>10 BY MR. GOLD:</p> <p>11 Q. Did he identify the lawyers who told</p> <p>12 him to lie?</p> <p>13 A. He didn't, no.</p> <p>14 Q. Why didn't you ask him?</p> <p>15 A. What the lawyers' names were?</p> <p>16 Q. Yeah, who asked you to lie.</p> <p>17 A. I mean, this was in the -- within the</p> <p>18 first three months of me working there. I was just</p> <p>19 scared out of my mind when he told me this story.</p> <p>20 Q. Why didn't you just quit?</p> <p>21 A. Because I loved the job.</p> <p>22 Q. You loved the job even though you were</p> <p>23 told never talk to Daniel Pipes, never talk to Gregg</p> <p>24 Roman, never talk to Marnie, because you would be</p> <p>25 terminated if you talked to any about any of the</p>
<p>Page 145</p> <p>1 Q. So the only thing you know about</p> <p>2 Tiffany Lee is what Matt Bennett may have told you,</p> <p>3 correct?</p> <p>4 A. Correct.</p> <p>5 Q. And based on what Matt Bennett told</p> <p>6 you, you felt you couldn't talk to Daniel Pipes, you</p> <p>7 couldn't talk to Marnie O'Brien, you couldn't talk to</p> <p>8 Gregg Roman; is that accurate?</p> <p>9 MR. CARSON: Objection. That's</p> <p>10 not what her testimony was, but you can</p> <p>11 answer.</p> <p>12 THE WITNESS: He warned me against</p> <p>13 complaining about anything for that</p> <p>14 reason, about making any formal</p> <p>15 complaints.</p> <p>16 BY MR. GOLD:</p> <p>17 Q. And is that what inhibited -- what I'm</p> <p>18 -- Matt Bennett told you these things, that's what</p> <p>19 caused you not to tell anybody about anything, that</p> <p>20 you were working on the assumption that Matt Bennett</p> <p>21 told me not to do it therefore I won't do it?</p> <p>22 MR. CARSON: Objection.</p> <p>23 THE WITNESS: Well --</p> <p>24 MR. CARSON: Object to the form.</p> <p>25 You can answer.</p>	<p>Page 147</p> <p>1 problems you had at MEF, correct?</p> <p>2 A. Correct.</p> <p>3 Q. But then in November Daniel Pipes came</p> <p>4 to your office as you so testified and you told him</p> <p>5 everything that was bothering you, correct?</p> <p>6 A. I didn't tell him everything that</p> <p>7 bothered me that first initial meeting, no.</p> <p>8 Q. When did you finally tell him</p> <p>9 everything? In the second meeting?</p> <p>10 A. I told him a lot of what was going on</p> <p>11 with Gregg --</p> <p>12 Q. Did you tell him that Matt Bennett --</p> <p>13 did you tell him what Matt Bennett had told you?</p> <p>14 A. About Tiffany Lee?</p> <p>15 Q. Yeah, about -- that lawyers will come</p> <p>16 into the office, they'll tell you to lie, there's no</p> <p>17 reason to report anything, you're going to get</p> <p>18 terminated, did you tell him about that conversation?</p> <p>19 A. No.</p> <p>20 Q. Why not?</p> <p>21 A. Because we were telling Daniel what was</p> <p>22 happening then, so it didn't seem to apply.</p> <p>23 Q. Okay. So -- well, things you were</p> <p>24 talking about, some of them occurred back in March of</p> <p>25 2018, and this is now seven or eight months later.</p>



<p style="text-align: right;">Page 148</p> <p>1 Did Daniel ever ask you why you waited so long to 2 make the report?</p> <p>3 A. No, he never asked.</p> <p>4 Q. Did you ever tell him why you waited so 5 long to make the report?</p> <p>6 A. I mean, we told him that -- about the 7 instructions not to talk to him -- 8 (Brief interruption.) 9 THE WITNESS: Yes, we did --</p> <p>10 BY MR. GOLD:</p> <p>11 Q. I'm sorry, I couldn't hear your answer. 12 Pardon me?</p> <p>13 A. We told him about the instructions not 14 to talk to him and the way that Gregg had run the 15 office so that he was the top guy, the head -- that 16 we weren't -- couldn't go over him.</p> <p>17 Q. Okay. So that was -- that had to do 18 with Gregg's management style, that wasn't 19 discrimination, was it?</p> <p>20 MR. CARSON: Objection.</p> <p>21 THE WITNESS: What?</p> <p>22 MR. CARSON: Calls for a legal 23 conclusion.</p> <p>24 BY MR. GOLD:</p> <p>25 Q. The fact that Gregg -- you were told by</p>	<p style="text-align: right;">Page 150</p> <p>1 Mr. Gold, just so you know, I don't know 2 if I got your full question before that.</p> <p>3 MR. GOLD: Yeah. My question -- 4 read back what I had said -- oh, I think 5 we're talking about, quote, Gregg's 6 management style. Okay?</p> <p>7 BY MR. GOLD:</p> <p>8 Q. So the fact that Gregg had a certain 9 management style that you obviously didn't agree 10 with, I'm asking you, that didn't constitute sex 11 discrimination in your mind, correct?</p> <p>12 MR. CARSON: Objection. Calls for 13 a legal conclusion. Assuming facts not 14 in evidence.</p> <p>15 You can answer.</p> <p>16 BY MR. GOLD:</p> <p>17 Q. You can answer the question.</p> <p>18 A. It just made there -- you feel like 19 there was nowhere to -- nobody to tell, nobody --</p> <p>20 Q. But you loved the job anyway, so what 21 are you going to talk about anyway, you said you 22 loved it there. So did you tell Daniel Pipes that 23 you loved your job --</p> <p>24 A. I didn't love it there, but I liked the 25 --</p>
<p style="text-align: right;">Page 149</p> <p>1 Gregg not to talk to anybody above him.</p> <p>2 MR. CARSON: Objection.</p> <p>3 BY MR. GOLD:</p> <p>4 Q. That is how he chose --</p> <p>5 MR. CARSON: Calls for a legal 6 conclusion.</p> <p>7 BY MR. GOLD:</p> <p>8 Q. If that is true, that was his 9 prerogative to how he wanted to run the office, he 10 was the director, correct?</p> <p>11 THE COURT REPORTER: Excuse me, 12 Mr. Gold, I didn't hear --</p> <p>13 MR. CARSON: Objection.</p> <p>14 THE COURT REPORTER: I didn't hear 15 the question.</p> <p>16 MR. CARSON: Calls for legal 17 conclusion. Assuming facts not in 18 evidence.</p> <p>19 MR. GOLD: Seth, I'm going to ask 20 you -- listen, I got no problem with you 21 objecting, but you got to put it on mute 22 when your child is acting up, please. 23 It's making it difficult to hear the 24 answers.</p> <p>25 THE COURT REPORTER: Yeah,</p>	<p style="text-align: right;">Page 151</p> <p>1 Q. -- and you loved working --</p> <p>2 A. I did tell him that I loved my job and 3 that --</p> <p>4 Q. Okay.</p> <p>5 A. -- the mission, but I didn't like the 6 working environment, but I put up with it because I 7 liked the job, I thought it was going to be more for 8 me than it was.</p> <p>9 Q. What did you -- how was it going to be 10 more than you thought it would be? You thought you 11 were going to become the director of development, is 12 that it?</p> <p>13 A. Even if I didn't, I thought it would be 14 a career job -- like a much longer stay there. You 15 know, I was already building the program --</p> <p>16 Q. What job --</p> <p>17 A. -- portion of MEF bigger.</p> <p>18 Q. I'm sorry, what job did you have before 19 you came to MEF? I believe you were working for like 20 the -- the Hotel Chelsea before you came here; is 21 that right?</p> <p>22 A. That wasn't my last employment before 23 there. It was at Icon Hospitality. But it was --</p> <p>24 Q. Okay. How long were you at the Chelsea 25 Hotel?</p>



<p>Page 152</p> <p>1 A. Five years I think.</p> <p>2 Q. What happened there?</p> <p>3 A. I took another job.</p> <p>4 Q. At MEF, correct?</p> <p>5 A. No.</p> <p>6 Q. Where were you working --</p> <p>7 A. Again, Icon Hospitality -- Icon</p> <p>8 Hospitality was my last job before.</p> <p>9 Q. And how long had you worked there?</p> <p>10 A. Two years I think.</p> <p>11 Q. Okay. Were you thinking of that being</p> <p>12 a lifetime job for you as well?</p> <p>13 A. No, I let them know when I got hired</p> <p>14 that it was not the plan.</p> <p>15 Q. How about the job at the Chelsea, was</p> <p>16 that going to be a lifetime job as well?</p> <p>17 A. I mean, I was not thinking about it as</p> <p>18 much then because I was younger.</p> <p>19 Q. How old were you when you took the job</p> <p>20 at the Chelsea?</p> <p>21 A. I don't remember exactly how old I was.</p> <p>22 Q. Well, how old were you when you took</p> <p>23 the job at MEF?</p> <p>24 A. I was -- three years ago. Thirty --</p> <p>25 MR. CARSON: 2017.</p>	<p>Page 154</p> <p>1 Q. Okay. And did Lisa Barbounis like</p> <p>2 working at MEF?</p> <p>3 MR. CARSON: Objection.</p> <p>4 BY MR. GOLD:</p> <p>5 Q. To the best of your knowledge.</p> <p>6 A. Parts of it.</p> <p>7 Q. What parts did she like?</p> <p>8 A. She liked the mission as well.</p> <p>9 Q. She liked being with Tommy -- liked</p> <p>10 going to the UK and hanging out with Danny Tommo?</p> <p>11 MR. CARSON: Objection. You're</p> <p>12 asking her --</p> <p>13 BY MR. GOLD:</p> <p>14 Q. Did she like that part?</p> <p>15 MR. CARSON: You can answer to the</p> <p>16 extent you know what Lisa likes and what</p> <p>17 she doesn't like.</p> <p>18 MR. GOLD: Why don't we -- I'll</p> <p>19 rephrase the question.</p> <p>20 BY MR. GOLD:</p> <p>21 Q. What did she tell you about her</p> <p>22 relationship with Danny Tommo while she worked at</p> <p>23 MEF?</p> <p>24 A. They had worked together on a project</p> <p>25 and then later when she was separated they were more</p>
<p>Page 153</p> <p>1 THE WITNESS: 35 I think.</p> <p>2 BY MR. GOLD:</p> <p>3 Q. Okay. So when you left the job at</p> <p>4 Chelsea you were 33 years old, correct?</p> <p>5 A. I don't remember the exact dates of my</p> <p>6 employment -- but I worked at Icon Hospitality before</p> <p>7 MEF.</p> <p>8 Q. Okay. And you were 33 when you took</p> <p>9 that job, correct?</p> <p>10 A. Correct.</p> <p>11 Q. So now that you became --</p> <p>12 A. I think.</p> <p>13 Q. Now that you reached the ripe old age</p> <p>14 of 35 you thought this was going to be a lifetime</p> <p>15 engagement for you at MEF?</p> <p>16 A. It was a job that I liked --</p> <p>17 MR. CARSON: Objection.</p> <p>18 THE WITNESS: -- more than what I</p> <p>19 was doing.</p> <p>20 MR. GOLD: Okay.</p> <p>21 THE WITNESS: So that's --</p> <p>22 BY MR. GOLD:</p> <p>23 Q. Did you ever tell Gregg how much you</p> <p>24 liked working at MEF?</p> <p>25 A. I'm sure I did.</p>	<p>Page 155</p> <p>1 romantically personally involved, but --</p> <p>2 Q. What do you mean when she was -- when</p> <p>3 was she ever separated from her husband?</p> <p>4 A. I don't know exactly when it was.</p> <p>5 Q. Was it while she was working at MEF?</p> <p>6 A. Yes.</p> <p>7 Q. And what exactly did she tell you?</p> <p>8 A. About what?</p> <p>9 Q. About their sexual encounters together?</p> <p>10 A. I don't remember exactly what she told</p> <p>11 me. I mean, it's -- I don't remember exactly what</p> <p>12 she told me.</p> <p>13 Q. Are you aware of an incident where he</p> <p>14 had, quote, rough sex with her and had a black eye</p> <p>15 when she came to work one day?</p> <p>16 A. I'm aware of that incident, yes.</p> <p>17 MR. CARSON: Objection.</p> <p>18 BY MR. GOLD:</p> <p>19 Q. What did she tell you about that?</p> <p>20 A. Just that it happened.</p> <p>21 Q. Well, didn't she first say she fell in</p> <p>22 the shower?</p> <p>23 A. Did I think she first fell in the</p> <p>24 shower? No.</p> <p>25 Q. Did she ever tell you that she had a</p>

<p>Page 156</p> <p>1 black eye because she fell in the shower?</p> <p>2 A. No, she never told me that.</p> <p>3 Q. Did she -- what did she -- did she ever</p> <p>4 tell you that she had a black eye for some other</p> <p>5 reason unrelated to Danny Thomas?</p> <p>6 A. I don't remember.</p> <p>7 Q. Okay. So how long did that</p> <p>8 relationship last with Danny Thomas the best of your</p> <p>9 knowledge?</p> <p>10 A. I don't know exactly how long.</p> <p>11 Q. Was it -- was she still seeing Danny</p> <p>12 Thomas when you left the organization?</p> <p>13 A. I don't think so.</p> <p>14 Q. Did you ever go to the UK with her for</p> <p>15 a rally of sorts?</p> <p>16 A. I did.</p> <p>17 Q. When was that?</p> <p>18 A. June of 2018.</p> <p>19 Q. Okay. So June of 2018 you went with</p> <p>20 her, and was that on MEF business or personal</p> <p>21 business, personal pleasure?</p> <p>22 A. That was for MEF.</p> <p>23 Q. Okay. And where did you stay?</p> <p>24 A. We stayed in a hotel.</p> <p>25 Q. Who paid for the plane tickets?</p>	<p>Page 158</p> <p>1 Q. Did she tell you how that -- who</p> <p>2 initiated that contact, did she call him or did he</p> <p>3 call her?</p> <p>4 A. They were working on another rally</p> <p>5 together I believe.</p> <p>6 Q. In the UK?</p> <p>7 A. Correct.</p> <p>8 Q. Now, as I understand it during that</p> <p>9 visit to the UK for that rally MEF paid for half your</p> <p>10 plane tickets?</p> <p>11 A. The one that Lisa and I attended.</p> <p>12 Q. Yeah. And who arranged for that?</p> <p>13 Gregg?</p> <p>14 A. Lisa and Gregg I believe.</p> <p>15 Q. Okay. And -- I'll come back to that.</p> <p>16 MR. GOLD: Let's go to Exhibit 4.</p> <p>17 THE COURT REPORTER: Excuse me.</p> <p>18 Mr. Carson, do you mind muting, please?</p> <p>19 MR. CARSON: Yeah. Sorry. I</p> <p>20 thought I was on mute. Sorry about</p> <p>21 that.</p> <p>22 BY MR. GOLD:</p> <p>23 Q. Okay. So I think we've exhausted the</p> <p>24 conversations that Lisa had with Matt Bennett where</p> <p>25 Bennett told her that Gregg was -- Gregg told Marnie</p>
<p>Page 157</p> <p>1 A. MEF paid for half of the plane tickets</p> <p>2 and then the rest was left up to us.</p> <p>3 Q. Okay. And so you say it was MEF</p> <p>4 business. What exactly was the MEF business in the</p> <p>5 UK that you were participating in?</p> <p>6 A. We were putting on a rally there for</p> <p>7 Tommy Robinson, and Lisa and I attended the rally and</p> <p>8 we were just asked to report back on how it went and</p> <p>9 what happened.</p> <p>10 Q. Do you know whether she had met with</p> <p>11 Danny Thomas during that visit to the UK when you</p> <p>12 were with her?</p> <p>13 A. We met him at the rally. It was the</p> <p>14 first time either of us had met him in person and</p> <p>15 that was the only time we saw him. We didn't see him</p> <p>16 again after we left the rally.</p> <p>17 Q. Had she already had a relationship with</p> <p>18 him at that point?</p> <p>19 A. No.</p> <p>20 Q. Okay. So that was the first time they</p> <p>21 met.</p> <p>22 A. Correct.</p> <p>23 Q. Okay. And did Lisa then tell you that</p> <p>24 she had met with him thereafter?</p> <p>25 A. Yes.</p>	<p>Page 159</p> <p>1 to watch her. Did you have any kind of relationship</p> <p>2 with Matt Bennett?</p> <p>3 A. Just working together.</p> <p>4 Q. Did you ever register any complaints</p> <p>5 about your interactions with Matt Bennett with Daniel</p> <p>6 Pipes?</p> <p>7 A. I didn't, no.</p> <p>8 Q. Did you ever register any complaints</p> <p>9 about the relationship you had with Matt Bennett</p> <p>10 prior to leaving MEF?</p> <p>11 A. I didn't, no.</p> <p>12 MR. GOLD: Let's go to Exhibit 5.</p> <p>13 Can you hold on a second?</p> <p>14 (Pause in proceedings.)</p> <p>15 MR. GOLD: Sorry about that. Can</p> <p>16 you hear me?</p> <p>17 THE WITNESS: Uh-huh.</p> <p>18 BY MR. GOLD:</p> <p>19 Q. Okay. Why don't you read through this</p> <p>20 --</p> <p>21 MR. GOLD: Scroll through this,</p> <p>22 Matt.</p> <p>23 THE WITNESS: Okay.</p> <p>24 BY MR. GOLD:</p> <p>25 Q. In this particular e-mail Lisa -- this</p>

<p>Page 160</p> <p>1 is again a text conversation between you -- a chain 2 of text messages between you and Lisa, correct? 3 A. Uh-huh. Yes. 4 Q. And she seems to be pretty happy that 5 Gregg told her that she was on top of her shit, so 6 that was I guess a compliment of sorts that Gregg 7 gave to Lisa? 8 A. Yes, a rarity. 9 Q. Okay. And that would be in February of 10 2018, correct? 11 A. Correct. 12 Q. Do you know why he complimented her on 13 her work at that point in time? Was there a project 14 she was working on or something she was planning? 15 A. I don't know. 16 Q. What was her job, by the way, Lisa's 17 job at MEF? 18 A. She was the executive liaison and then 19 the director of communications. 20 Q. Okay. So in February of '18 was she 21 already director of communications, do you know? 22 A. No, she was not. 23 Q. Not yet. So when you say liaison, 24 liaison -- what does that mean, what did you 25 understand her job to be?</p>	<p>Page 162</p> <p>1 leave at 3:30 instead of coming in 9 to 5, you could. 2 Q. Okay. 3 A. It wasn't a free-for-all 24-hour day. 4 Q. Okay. But you -- I'm sure you've 5 worked jobs where your boss called you after you left 6 the office, correct? 7 A. No, not really. 8 Q. So your -- so even though this is the 9 job you wanted for life, you were resentful if 10 somebody called you after 5:00 at night? 11 A. He would call at like 10:00 at night. 12 It felt very inappropriate, yes. 13 Q. And when did he call you at 10:00 at 14 night? 15 A. It happened on multiple occasions. 16 Q. And what did he talk about? Work? 17 A. Yeah, sometimes it would be work, 18 sometimes it would be about where we would be working 19 the next day or that week. 20 Q. So did you tell Gregg do not call me 21 after 5:00 anymore, I don't want anybody bothering me 22 after I leave the office? 23 A. Yeah, I mean it was discussed within 24 the office. 25 Q. About not getting calls after hours?</p>
<p>Page 161</p> <p>1 A. She was an executive assistant to 2 Daniel and Gregg basically, to Gregg. 3 Q. Okay. Okay. Was she there when you -- 4 when you were hired, she had already been working 5 there, I take it, or did she come on afterward? 6 A. We started at the same time. 7 Q. Okay. And you had -- 8 A. I think she started a week ahead of me. 9 Q. Okay. Got it. And -- 10 MR. GOLD: Can you go to Exhibit 11 6? 12 BY MR. GOLD: 13 Q. In that text exchange she states she's 14 totally ignoring calls from Gregg, as these calls 15 were after work hours I assume, meaning after 5:00. 16 Did Gregg ever call you after work hours for -- on 17 MEF business? 18 A. Yes. 19 Q. And you -- I think you testified 20 earlier that there were flex hours, so it really 21 didn't matter when Gregg would call you, whether it 22 was before 5 or after 5, correct? 23 A. Well, we had flex hours, but it was 24 still -- we were expected to work an eight-hour day, 25 it was just if you wanted to come in at 7:30 and</p>	<p>Page 163</p> <p>1 A. Yes, and even put into place where he 2 wasn't allowed to call us past 5:00 later. 3 Q. Is that when he was -- when he was out 4 of the office from November to March? 5 A. Correct. 6 Q. Okay. Well, before that did you ever 7 register a complaint with Daniel or Marnie that you 8 thought Gregg was calling you after hours and that 9 you wanted him to stop calling you after hours even 10 if he had a legitimate question about work? 11 A. I told Matt. 12 MR. CARSON: I'm just -- I'm going 13 to just object to the form of the 14 question. 15 BY MR. GOLD: 16 Q. What did -- 17 MR. CARSON: Before the complaint 18 you want to know if she complained? 19 BY MR. GOLD: 20 Q. Yeah, did you ever call Matt -- you 21 ever call Daniel Pipes and say Gregg's calling me at 22 10:00 at night to talk about work, I don't want 23 anybody calling me after I leave the office? 24 MR. CARSON: Objection. Asked and 25 answered.</p>

<p>Page 164</p> <p>1 BY MR. GOLD:</p> <p>2 Q. You said you told Matt that, correct?</p> <p>3 A. I told Matt that I felt it was</p> <p>4 inappropriate to be calling on things that weren't</p> <p>5 time sensitive, weren't -- it wasn't a I need to know</p> <p>6 this now, it was just calling at odd hours very late</p> <p>7 asking what you're doing in your personal life, and</p> <p>8 then if it was something work related, it was</p> <p>9 something that could have been sent in an e-mail or</p> <p>10 talked about the next day.</p> <p>11 Q. So why didn't you just tell Gregg don't</p> <p>12 call me anymore?</p> <p>13 A. Because it's hard to tell the head of</p> <p>14 the office who has the power to --</p> <p>15 Q. Oh, please.</p> <p>16 A. -- to fire you at will.</p> <p>17 Q. But you -- you loved this job, you were</p> <p>18 going to stay there until you dropped dead. Why</p> <p>19 couldn't you tell Gregg, hey, do me a favor, Gregg, I</p> <p>20 want to stay here, I love working here, just don't</p> <p>21 call me after 5:00, don't call me at 10:00, it</p> <p>22 disrupts my sleep, it disrupts my free time; if it</p> <p>23 can wait until tomorrow, call me tomorrow; are you</p> <p>24 telling me you were afraid to tell him that?</p> <p>25 MR. CARSON: I'm going to object</p>	<p>Page 166</p> <p>1 I don't even know if these are questions</p> <p>2 anymore, but objection to the extent</p> <p>3 it's a question.</p> <p>4 BY MR. GOLD:</p> <p>5 Q. You said you wanted to work there until</p> <p>6 you retired, correct?</p> <p>7 A. I said that I wanted to work there for</p> <p>8 an extended period of time, I thought it would be a</p> <p>9 substantial amount of time, yes, I don't know if it</p> <p>10 would be --</p> <p>11 Q. Okay.</p> <p>12 A. -- the last job I ever had.</p> <p>13 Q. Ten, twenty years?</p> <p>14 A. Ten years would have been --</p> <p>15 Q. Okay, so ten years, and yet here is</p> <p>16 Gregg, the director of the organization, calling you</p> <p>17 in the evening, which annoyed you, okay, even though</p> <p>18 you loved this job, you were, what, afraid to tell</p> <p>19 him not to call you at those hours?</p> <p>20 A. Yeah, because he did a lot of other --</p> <p>21 MR. CARSON: Objection. Form.</p> <p>22 BY MR. GOLD:</p> <p>23 Q. Go ahead, answer.</p> <p>24 MR. CARSON: Go ahead. You can</p> <p>25 answer.</p>
<p>Page 165</p> <p>1 to the form of that -- wait, don't</p> <p>2 answer the question. I'm going to</p> <p>3 object to the form of the question.</p> <p>4 BY MR. GOLD:</p> <p>5 Q. Go ahead. You can answer.</p> <p>6 MR. CARSON: You can answer, but,</p> <p>7 you know, listen to the question.</p> <p>8 THE WITNESS: I'm sorry, can you</p> <p>9 repeat the question?</p> <p>10 BY MR. GOLD:</p> <p>11 Q. I said you loved this job, you wanted</p> <p>12 to work there until you dropped dead, but you were</p> <p>13 afraid to tell Gregg don't call me after 5:00 because</p> <p>14 it's annoying to me and I don't like it, it's</p> <p>15 inconvenient for me, we can talk about it tomorrow.</p> <p>16 A. I never said I wanted to work there</p> <p>17 until I dropped dead.</p> <p>18 Q. Well, hypothetically, at least until</p> <p>19 you're 70, right? You were going to work there until</p> <p>20 you were 70 years old, 80 years old?</p> <p>21 A. I don't know if --</p> <p>22 MR. CARSON: I'm going to object.</p> <p>23 BY MR. GOLD:</p> <p>24 Q. 65 years old?</p> <p>25 MR. CARSON: I'm going to object.</p>	<p>Page 167</p> <p>1 THE WITNESS: He did a lot of</p> <p>2 other things, too, along with it, it</p> <p>3 wasn't just the phone calls, but, I</p> <p>4 mean, during that time he was making me</p> <p>5 feel uncomfortable in -- making a lot of</p> <p>6 people feel uncomfortable in an array of</p> <p>7 ways and making us feel like if you said</p> <p>8 anything or did anything, just like</p> <p>9 Tiffany Lee, we would -- we would be</p> <p>10 gone.</p> <p>11 BY MR. GOLD:</p> <p>12 Q. But meanwhile you knew what happened,</p> <p>13 quote, with, quote, Tiffany Lee, and you knew about</p> <p>14 him making you feel uncomfortable, and</p> <p>15 notwithstanding all of that, you wanted to work there</p> <p>16 for at least ten more years.</p> <p>17 MR. CARSON: Objection. Is that</p> <p>18 even a question?</p> <p>19 MR. GOLD: That's a question.</p> <p>20 BY MR. GOLD:</p> <p>21 Q. Is it not a fact that notwithstanding,</p> <p>22 quote, what happened to Tiffany Lee, which you heard</p> <p>23 from some third party, and notwithstanding the fact</p> <p>24 that he would call you after hours, and</p> <p>25 notwithstanding the fact that you were told not to</p>



<p style="text-align: right;">Page 168</p> <p>1 make any complaints to anybody other than Gregg, you</p> <p>2 would have liked to stay there for ten more years.</p> <p>3 MR. CARSON: Objection. Asked and</p> <p>4 answered.</p> <p>5 BY MR. GOLD:</p> <p>6 Q. Yes or no?</p> <p>7 MR. CARSON: Lack of foundation.</p> <p>8 BY MR. GOLD:</p> <p>9 Q. Yes or no?</p> <p>10 MR. CARSON: It wasn't some third</p> <p>11 party; it was a direct supervisor.</p> <p>12 MR. GOLD: It's a third -- it's</p> <p>13 not -- it wasn't from Tiffany Lee. It's</p> <p>14 a third party. Answer is yes or no.</p> <p>15 MR. CARSON: Not a third party.</p> <p>16 And if we're going -- as long as we're</p> <p>17 going to lay out all the facts of things</p> <p>18 that happened before --</p> <p>19 MR. GOLD: Listen, Seth, I don't</p> <p>20 need to have any talking -- speaking</p> <p>21 objections. You did that with Jon this</p> <p>22 morning. I don't have the patience for</p> <p>23 it today. The answer is yes or no.</p> <p>24 MR. CARSON: What's the question?</p> <p>25 MR. GOLD: The question is,</p>	<p style="text-align: right;">Page 170</p> <p>1 her finish?</p> <p>2 BY MR. GOLD:</p> <p>3 Q. -- to my question, ma'am. Yes or no,</p> <p>4 then you can explain your answer.</p> <p>5 MR. CARSON: Well, you can answer</p> <p>6 however you feel --</p> <p>7 THE WITNESS: I am answering.</p> <p>8 MR. CARSON: -- is appropriate.</p> <p>9 THE WITNESS: I am answering, but</p> <p>10 I have to explain that Matt had told us</p> <p>11 that Daniel -- and Daniel had told us</p> <p>12 that he was planning on retiring that --</p> <p>13 in 2019 and that Gregg would then be</p> <p>14 taking over and he would be off</p> <p>15 traveling the world and writing and he</p> <p>16 wouldn't be in charge of the office</p> <p>17 anymore, it wouldn't be him directly</p> <p>18 supervising us, and that there was a</p> <p>19 different plan going forward, and so</p> <p>20 there was some sort of light at the end</p> <p>21 of the tunnel where this job wouldn't</p> <p>22 include Gregg being in the office and</p> <p>23 Gregg being the one to tell us whether</p> <p>24 what we were doing was crap or if we</p> <p>25 were going to the bathroom too much or</p>
<p style="text-align: right;">Page 169</p> <p>1 notwithstanding all of her woes and</p> <p>2 tales of woes and all the inhibition she</p> <p>3 had about working at MEF, she wanted to</p> <p>4 stay there for at least ten more years;</p> <p>5 is that not a fact, ma'am?</p> <p>6 MR. CARSON: Objection. That's</p> <p>7 not her testimony. She testified --</p> <p>8 MR. GOLD: Then say no.</p> <p>9 MR. CARSON: -- that she loved her</p> <p>10 work --</p> <p>11 MR. GOLD: Let her answer the</p> <p>12 question.</p> <p>13 MR. CARSON: Yeah, you can answer</p> <p>14 the question. Is it yes or no?</p> <p>15 THE WITNESS: Matt had also told</p> <p>16 us that there was a different plan for</p> <p>17 how MEF would be going forward. Daniel</p> <p>18 was supposed to be retiring --</p> <p>19 BY MR. GOLD:</p> <p>20 Q. Ma'am, that's --</p> <p>21 A. -- and Gregg would be --</p> <p>22 Q. Not responding to --</p> <p>23 A. -- out of the office --</p> <p>24 Q. You're not responding --</p> <p>25 MR. CARSON: Are we going to let</p>	<p style="text-align: right;">Page 171</p> <p>1 hovering over us taking phone calls, all</p> <p>2 of that would be gone.</p> <p>3 BY MR. GOLD:</p> <p>4 Q. I'm going to -- okay. When you left</p> <p>5 there, okay -- when did you stop loving your job?</p> <p>6 When you left?</p> <p>7 A. Before I left.</p> <p>8 Q. Before you left. Give me a precise</p> <p>9 date when you woke up one day and said I hate this</p> <p>10 job, I want to leave.</p> <p>11 A. I mean, I -- I knew I had to leave.</p> <p>12 Q. When?</p> <p>13 A. In the spring of 2019.</p> <p>14 Q. And you left.</p> <p>15 A. In the fall, yes.</p> <p>16 Q. Okay. So -- and that's because, as we</p> <p>17 know, you had a job already lined up, correct?</p> <p>18 A. I wasn't going to leave until I had a</p> <p>19 job, but yes.</p> <p>20 Q. Well, why didn't you leave immediately</p> <p>21 when you realized you didn't like it there anymore,</p> <p>22 why didn't you just pick yourself up and leave?</p> <p>23 A. Because I have bills to pay.</p> <p>24 Q. Okay. Well, we all have bills to pay.</p> <p>25 That didn't change.</p>



<p>Page 172</p> <p>1 A. I don't see how what you're saying --</p> <p>2 Q. So when did you realize that Daniel</p> <p>3 Pipes was not going to retire and Gregg wasn't going</p> <p>4 to be flying around the world writing, you know, for</p> <p>5 MEF and not being in the office -- when did that --</p> <p>6 when did you have that awakening that that was not</p> <p>7 going to happen?</p> <p>8 A. In November of 2018 when we went --</p> <p>9 when Daniel --</p> <p>10 MR. CARSON: Yeah, also -- the</p> <p>11 other thing, too, is -- let's stop for a</p> <p>12 second because --</p> <p>13 MR. GOLD: You're interrupting the</p> <p>14 answer.</p> <p>15 MR. CARSON: Yeah, no, I'm -- no,</p> <p>16 because I was on mute when I started my</p> <p>17 objection, correct, I'm interrupting the</p> <p>18 answer.</p> <p>19 MR. GOLD: Go ahead.</p> <p>20 MR. CARSON: Her answer -- it's</p> <p>21 subject to the following objections.</p> <p>22 So, first of all, we're going to not ask</p> <p>23 questions like this anymore. You're</p> <p>24 just not. Or else I'm going to start</p> <p>25 instructing her not to answer them. All</p>	<p>Page 174</p> <p>1 ask her any questions anymore.</p> <p>2 MR. GOLD: Are we done?</p> <p>3 MR. CARSON: We're going to take</p> <p>4 -- we're going to take -- yeah, we're</p> <p>5 going to take a 20-minute break. Okay?</p> <p>6 So we'll see you guys in 20 minutes.</p> <p>7 MR. GOLD: Okay, good.</p> <p>8 MR. CARSON: Thank you.</p> <p>9 THE VIDEO SPECIALIST: Off the</p> <p>10 record.</p> <p>11 MR. GOLD: And do not talk to the</p> <p>12 witness.</p> <p>13 (A brief recess was taken from</p> <p>14 1:41 p.m. to 2:10 p.m.)</p> <p>15 THE VIDEO SPECIALIST: The time is</p> <p>16 2:10 p.m. Eastern. We are now back on</p> <p>17 the record.</p> <p>18 MR. GOLD: Is the witness back as</p> <p>19 well? Seth? Seth?</p> <p>20 MR. CARSON: Yeah, I think she's</p> <p>21 here.</p> <p>22 Patricia, you got to speak up.</p> <p>23 MR. CAVALIER: She's on mute.</p> <p>24 THE COURT REPORTER: Yeah, it</p> <p>25 looks like it's muted.</p>
<p>Page 173</p> <p>1 right? So stop characterizing her</p> <p>2 previous testimony with words like "when</p> <p>3 did you have this awakening." These</p> <p>4 questions are designed -- are</p> <p>5 argumentative, they're designed to</p> <p>6 embarrass and harass, and she's not</p> <p>7 going to answer them. So stop.</p> <p>8 MR. GOLD: I think you need to</p> <p>9 take a course in advocacy, Mr. Carson.</p> <p>10 This is a deposition.</p> <p>11 MR. CARSON: Okay.</p> <p>12 MR. GOLD: It's a deposition.</p> <p>13 MR. CARSON: Well, maybe --</p> <p>14 MR. GOLD: I get to ask the</p> <p>15 questions.</p> <p>16 MR. CARSON: -- maybe you need to</p> <p>17 practice for another 20 years, Mr. Gold,</p> <p>18 because --</p> <p>19 MR. GOLD: You get to make the</p> <p>20 objection.</p> <p>21 MR. CARSON: -- you're not going</p> <p>22 to ask her questions. All right?</p> <p>23 THE COURT REPORTER: I can't hear</p> <p>24 both of you.</p> <p>25 MR. CARSON: You're not going to</p>	<p>Page 175</p> <p>1 MR. GOLD: Are we back?</p> <p>2 MR. CARSON: Patricia, are you</p> <p>3 there?</p> <p>4 THE VIDEO SPECIALIST: Should we</p> <p>5 go off the record real quick?</p> <p>6 MR. GOLD: Yeah, give her a call,</p> <p>7 yeah, sure.</p> <p>8 THE VIDEO SPECIALIST: Off the</p> <p>9 record.</p> <p>10 (A brief recess was taken from</p> <p>11 2:10 p.m. to 2:17 p.m.)</p> <p>12 BY MR. GOLD:</p> <p>13 Q. I just have a couple quick follow-up</p> <p>14 questions on those phone calls from Gregg. Can you</p> <p>15 hear me?</p> <p>16 A. Yes, now I can.</p> <p>17 Q. Do you recall -- if I'm not mistaken,</p> <p>18 you were on salary, correct? You didn't get paid by</p> <p>19 the hour, correct?</p> <p>20 THE VIDEO SPECIALIST: Mr. Gold?</p> <p>21 MR. GOLD: Yeah.</p> <p>22 THE VIDEO SPECIALIST: I want to</p> <p>23 make sure we are now on the record.</p> <p>24 MR. GOLD: I'm sorry, go ahead.</p> <p>25 THE WITNESS: I'm sorry, what was</p>

<p>1 the question?</p> <p>2 BY MR. GOLD:</p> <p>3 Q. When you were working for MEF you were</p> <p>4 an exempt employee, correct?</p> <p>5 A. I was a salary employee.</p> <p>6 Q. Salary employee, and you weren't -- so</p> <p>7 therefore you weren't paid by the hours, correct?</p> <p>8 A. Correct.</p> <p>9 Q. And you understand the job could</p> <p>10 require you to work more than 40 hours a week,</p> <p>11 correct?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. Do you recall that Gregg may</p> <p>14 have called you when he was in a different time zone</p> <p>15 perhaps, whether it be California, Israel, wherever,</p> <p>16 were there occasions when he called you from out of</p> <p>17 the country?</p> <p>18 A. It's possible. I don't remember.</p> <p>19 Q. All right.</p> <p>20 MR. GOLD: Could you please put up</p> <p>21 exhibit -- I guess we're up to Exhibit 7.</p> <p>22 BY MR. GOLD:</p> <p>23 Q. There's a reference there to a Mr. --</p> <p>24 is Eman a first name or a last name of this employee?</p> <p>25 A. Eman. She's a female.</p>	<p>Page 176</p> <p>1 A. I don't remember.</p> <p>2 Q. Okay. Do you know -- was this just an</p> <p>3 isolated event here or was this something that Eman</p> <p>4 couldn't get along with Daniel Pipes or couldn't get</p> <p>5 along with certain people that worked at MEF? Do you</p> <p>6 have any recollection?</p> <p>7 A. Well, Eman was -- was the one that</p> <p>8 Daniel had admitted to us that -- that they had tried</p> <p>9 to make quit by making so uncomfortable. So, yeah,</p> <p>10 there was definitely daily things that were</p> <p>11 constantly happening.</p> <p>12 Q. Daniel Pipes told you that?</p> <p>13 A. Daniel told us when we were in the</p> <p>14 conference room all together, yes, that he had given</p> <p>15 Gregg the authority to make her feel so uncomfortable</p> <p>16 that she would leave.</p> <p>17 Q. Okay. And do you know why he -- why --</p> <p>18 what was the motivation for that, if you know?</p> <p>19 A. I know they didn't want her working</p> <p>20 there anymore and she was the one that they said was</p> <p>21 a walking liability because she was a female, gay,</p> <p>22 and Muslim.</p> <p>23 Q. And who made that statement?</p> <p>24 A. We were told that Gregg and Daniel had</p> <p>25 both, Matt had told us that --</p>
<p>Page 177</p> <p>1 Q. Is that his first name?</p> <p>2 A. Her first name that was used there.</p> <p>3 Q. What's -- is it a she or a he?</p> <p>4 A. A she.</p> <p>5 Q. Okay. What was her second name, her</p> <p>6 maiden name or surname?</p> <p>7 A. Eman Patel was the name she used at</p> <p>8 MEF.</p> <p>9 Q. Eman Patel. That's right. Okay. Got</p> <p>10 it.</p> <p>11 So it says Eman was crying in the</p> <p>12 office today and laid the blame on Daniel Pipes.</p> <p>13 Lisa sends you that in an e-mail. Do you know much</p> <p>14 about that issue when it occurred?</p> <p>15 A. I read "Eman was crying in my office</p> <p>16 today."</p> <p>17 Q. And that was from Lisa to you?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Do you know -- and this is</p> <p>20 because of some interaction that she had with Daniel</p> <p>21 Pipes?</p> <p>22 A. I guess. I don't remember.</p> <p>23 Q. Do you know if the -- what it was</p> <p>24 about, do you have any recollection of what it was</p> <p>25 about?</p>	<p>Page 179</p> <p>1 Q. Matt -- Matt again, no -- but no</p> <p>2 firsthand knowledge; you heard this from Matt.</p> <p>3 MR. CARSON: Is that a question or</p> <p>4 are you just now commenting on her</p> <p>5 testimony --</p> <p>6 BY MR. GOLD:</p> <p>7 Q. You said you heard that from Matt,</p> <p>8 correct?</p> <p>9 MR. CARSON: You heard her</p> <p>10 testimony. She just testified Matt</p> <p>11 said.</p> <p>12 MR. GOLD: I want to be sure.</p> <p>13 BY MR. GOLD:</p> <p>14 Q. And Matt told you that, correct?</p> <p>15 MR. CARSON: Just comment on her</p> <p>16 testimony -- every time she says</p> <p>17 something you're going to pretend like</p> <p>18 --</p> <p>19 MR. GOLD: I'm going to be a</p> <p>20 ventriloquist --</p> <p>21 THE COURT REPORTER: I can't hear</p> <p>22 you. You're talking at the same time.</p> <p>23 MR. CARSON: Yeah, I'm going to --</p> <p>24 MR. GOLD: Let's move on.</p> <p>25 BY MR. GOLD:</p>

<p>Page 180</p> <p>1 Q. Was that comment made --</p> <p>2 MR. CARSON: I'm going to instruct</p> <p>3 counsel --</p> <p>4 BY MR. GOLD:</p> <p>5 Q. Was that comment made --</p> <p>6 MR. CARSON: I'm going to instruct</p> <p>7 counsel -- all right. When you're done</p> <p>8 I'll put my instruction on the record.</p> <p>9 BY MR. GOLD:</p> <p>10 Q. Was that comment made while Daniel</p> <p>11 Pipes and Gregg were in the room?</p> <p>12 MR. CARSON: I'm going to instruct</p> <p>13 counsel to discontinue commenting on the</p> <p>14 testimony. Stop saying "okay" --</p> <p>15 MR. GOLD: How about if you go to</p> <p>16 a mirror and direct yourself to do the</p> <p>17 same thing.</p> <p>18 THE COURT REPORTER: I can't -- I</p> <p>19 didn't hear you. I didn't hear you,</p> <p>20 Mr. Gold.</p> <p>21 MR. CARSON: Stop saying the words</p> <p>22 "okay" after she says something, stop --</p> <p>23 MR. GOLD: I'll do whatever I</p> <p>24 please --</p> <p>25 MR. CARSON: -- stop making</p>	<p>Page 182</p> <p>1 room or was Daniel Pipes in the room?</p> <p>2 A. No, I don't think so.</p> <p>3 Q. And when did you have that conversation</p> <p>4 with Matt?</p> <p>5 A. I don't remember exactly when it was.</p> <p>6 Q. Was it before November 18th or after</p> <p>7 November 18th, 2018?</p> <p>8 A. Before.</p> <p>9 Q. So this would have been early on in</p> <p>10 your employment, I take it?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Because this e-mail is dated</p> <p>13 February 28th, 2018. Did Eman eventually leave the</p> <p>14 office?</p> <p>15 A. Sorry, what was that?</p> <p>16 Q. Was Eman still employed at MEF when you</p> <p>17 departed?</p> <p>18 A. No.</p> <p>19 Q. Do you know when she left?</p> <p>20 A. I don't remember exactly when it was.</p> <p>21 Q. Was it in 2018 or 2019, if you can</p> <p>22 recall?</p> <p>23 A. It was in 2018.</p> <p>24 Q. Okay. Were you friendly with her?</p> <p>25 A. Yes.</p>
<p>Page 181</p> <p>1 comments --</p> <p>2 MR. GOLD: I'll do whatever I</p> <p>3 please.</p> <p>4 MR. CARSON: Discontinue all --</p> <p>5 MR. GOLD: Let's move along. All</p> <p>6 right?</p> <p>7 MR. CARSON: No, you won't. No,</p> <p>8 you won't.</p> <p>9 MR. GOLD: Are you done?</p> <p>10 MR. CARSON: If it happens again</p> <p>11 -- if it happens again, I'll point it</p> <p>12 out again. If it continues to happen, I</p> <p>13 guess we'll stop the deposition and</p> <p>14 we'll deal with it.</p> <p>15 MR. GOLD: Do whatever you want.</p> <p>16 Okay?</p> <p>17 MR. CARSON: I will.</p> <p>18 BY MR. GOLD:</p> <p>19 Q. My question is -- my question is this,</p> <p>20 ma'am. I'm going to move on. My question -- was</p> <p>21 Gregg Roman in the room when Daniel Pipes told you</p> <p>22 that they wanted to get rid of Eman?</p> <p>23 A. I don't think he was.</p> <p>24 Q. Okay. And this conversation that you</p> <p>25 had with Matt, was -- did -- was Gregg Roman in the</p>	<p>Page 183</p> <p>1 Q. And after Eman left is that when you</p> <p>2 took your -- you became a -- is that whose position</p> <p>3 you took over when -- after she left?</p> <p>4 A. No.</p> <p>5 Q. Okay. What was her title when she</p> <p>6 left?</p> <p>7 A. She was communications. I don't know</p> <p>8 what the exact title was.</p> <p>9 Q. Okay. So she had the same title as --</p> <p>10 what was -- and your title again? I'm sorry, you</p> <p>11 were program director?</p> <p>12 A. Yes.</p> <p>13 Q. So who -- did anyone assume her</p> <p>14 responsibilities after she left?</p> <p>15 A. No, not that I know of.</p> <p>16 Q. Okay. All right. Were you -- what was</p> <p>17 your relationship like with Eman? I mean, did you</p> <p>18 ever -- any -- have any conversations with her about</p> <p>19 her -- during her tenure at MEF?</p> <p>20 A. Mostly about work, not much outside of</p> <p>21 work, just general pleasantries. We were -- we</p> <p>22 weren't close, but we were friendly.</p> <p>23 Q. Didn't she train you when you were</p> <p>24 first hired?</p> <p>25 A. There wasn't much training involved,</p>

<p style="text-align: right;">Page 184</p> <p>1 but she probably for the first day or two told me how 2 she did things.</p> <p>3 Q. And at that point she -- so after she 4 left in -- as I understand it, her job title was 5 program director, so who became the program director 6 after --</p> <p>7 A. That was my job.</p> <p>8 Q. Okay. So --</p> <p>9 A. Before she left.</p> <p>10 Q. Before she left.</p> <p>11 A. That was not her job when she was there 12 when I was there.</p> <p>13 Q. Okay. So you became the program 14 director after she, quote, had some minimal training 15 with you?</p> <p>16 A. I came into MEF with that role. She 17 had previously done it before me. She was taking on 18 a new role. She told --</p> <p>19 Q. What role was that?</p> <p>20 A. In communications.</p> <p>21 Q. Okay. So she would be into -- moving 22 into -- as director or just a role in communications?</p> <p>23 A. Again, I don't remember what the exact 24 title was that she had.</p> <p>25 MR. GOLD: Okay. Let's move on to</p>	<p style="text-align: right;">Page 186</p> <p>1 her resignation or what the reason she gave for 2 resigning?</p> <p>3 A. I don't know what reason she gave them.</p> <p>4 Q. Have you -- did you speak to her after 5 she left MEF?</p> <p>6 A. Not about work or MEF.</p> <p>7 Q. What about?</p> <p>8 A. I've talked to her about food posts she 9 has, she cooks, food.</p> <p>10 Q. Okay.</p> <p>11 A. Just --</p> <p>12 Q. Where is she working -- do you know 13 where she's working now?</p> <p>14 A. I don't, no.</p> <p>15 Q. Okay.</p> <p>16 MR. GOLD: All right. Let's go to 17 Exhibit 8.</p> <p>18 BY MR. GOLD:</p> <p>19 Q. And if you would be kind enough to just 20 read through that. These are an exchange of text 21 messages that occurred in March of 2018 and this is 22 while Lisa was on a trip to Israel with Gregg.</p> <p>23 A. Okay.</p> <p>24 Q. And she's complaining that she can't 25 post on social media while she's there.</p>
<p style="text-align: right;">Page 185</p> <p>1 Exhibit 18. I'm sorry, Exhibit 8.</p> <p>2 BY MR. GOLD:</p> <p>3 Q. One last point. Did Eman ever tell you 4 why she was leaving MEF?</p> <p>5 A. She had told us, you know, for -- since 6 she got there that she was very unhappy with the work 7 environment and the constant monitoring and the way 8 she was treated there.</p> <p>9 Q. And do you remember any details about 10 how she was treated?</p> <p>11 A. I know she was -- Gregg made comments 12 about her having to take too many doctors 13 appointments and taking time away from the job for 14 those doctors appointments. He would count how many 15 times she went to the bathroom. She was just very -- 16 felt very unhappy with how she was treated.</p> <p>17 Q. When did you have that conversation 18 with her?</p> <p>19 A. While she was still there, she 20 mentioned it a couple times, I'm not sure of the 21 exact dates.</p> <p>22 Q. Do you know if she left before November 23 2018 or thereafter?</p> <p>24 A. She left before.</p> <p>25 Q. Okay. Do you know whether she tendered</p>	<p style="text-align: right;">Page 187</p> <p>1 Did you have any more conversations or 2 did you exchange any further messages with Lisa about 3 why she -- Gregg had told her she couldn't post on 4 social media while she was in Israel?</p> <p>5 A. Well, he had already told us that we 6 weren't supposed to -- Daniel wasn't supposed to know 7 that Lisa went with him, so --</p> <p>8 Q. Right.</p> <p>9 A. -- we weren't supposed to tell anybody, 10 so I assume that's why she couldn't post on social 11 media, because no one was supposed to know.</p> <p>12 Q. Couldn't be for security reasons that 13 MEF had, no posting while they were in a foreign 14 country?</p> <p>15 A. I was never told that, so I can't speak 16 to that.</p> <p>17 Q. But you never went on a trip with Gregg 18 to Israel of course, right?</p> <p>19 A. I didn't, but I went abroad.</p> <p>20 Q. You went to UK.</p> <p>21 A. Correct.</p> <p>22 Q. Was Gregg there on that trip?</p> <p>23 A. He was not.</p> <p>24 Q. Okay. Anyway, as far as -- this trip 25 was to Israel, and you don't recall anything --</p>



<p style="text-align: right;">Page 188</p> <p>1 anything in the handbook or policy of MEF that spoke</p> <p>2 to the issue of posting things on social media and</p> <p>3 the possibility that it could result in security</p> <p>4 threats against employees or MEF in general?</p> <p>5 A. If it pertains to MEF, but if you're</p> <p>6 just posting a picture that you're traveling</p> <p>7 somewhere, that has nothing to do with MEF.</p> <p>8 Q. Well, if the terrorists knew where you</p> <p>9 were at the time, that would have a lot to do with</p> <p>10 MEF.</p> <p>11 A. So with that rational thinking, you</p> <p>12 could never post where you are ever in life.</p> <p>13 Q. No, only -- I'm saying if you're in</p> <p>14 Israel.</p> <p>15 A. Why only in Israel?</p> <p>16 Q. Well, because that's where -- there's a</p> <p>17 good possibility of terrorism happening more likely</p> <p>18 in Israel than in the United States.</p> <p>19 A. We have terrorist --</p> <p>20 MR. CARSON: I'm going to object</p> <p>21 to form, argumentative. Comical</p> <p>22 overall.</p> <p>23 Go ahead. You can answer.</p> <p>24 MR. GOLD: I'm just asking her</p> <p>25 questions, that's all.</p>	<p style="text-align: right;">Page 190</p> <p>1 wanting their employees to post on social media when</p> <p>2 they were out of the country, that would be a</p> <p>3 legitimate concern?</p> <p>4 MR. CARSON: I'm going to object.</p> <p>5 It's assuming facts not in evidence.</p> <p>6 There's been no -- like, zero evidence</p> <p>7 that these pretend security protocols</p> <p>8 even exist, but -- so if we're going to</p> <p>9 ask questions on pretend security</p> <p>10 protocols, as long as everyone's aware</p> <p>11 that that's what --</p> <p>12 MR. GOLD: Okay. I'm going to</p> <p>13 move on -- I'm going to move on anyway.</p> <p>14 Let's go to Exhibit 9.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. It says: Gregg has me working like a</p> <p>17 dog. It's so hard to work with the kids.</p> <p>18 Did Lisa at times register complaints</p> <p>19 with you about how hard she was working for MEF?</p> <p>20 A. She didn't regularly register</p> <p>21 complaints about how -- she would mention that she</p> <p>22 was doing a lot of work, like something like that,</p> <p>23 nothing out of the ordinary.</p> <p>24 Q. She was overworked, is that what she</p> <p>25 would tell you?</p>
<p style="text-align: right;">Page 189</p> <p>1 THE WITNESS: I don't agree with</p> <p>2 the reasoning there, but --</p> <p>3 BY MR. GOLD:</p> <p>4 Q. Okay. So you don't recall anything in</p> <p>5 the policies of MEF that spoke to the issue of</p> <p>6 posting on social media while you were out of the</p> <p>7 country or in Israel.</p> <p>8 A. No.</p> <p>9 Q. Okay. All right. Do you know whether</p> <p>10 Gregg ever posted on social media when he was in</p> <p>11 Israel?</p> <p>12 A. I don't know any of Gregg's social</p> <p>13 media, so no.</p> <p>14 Q. Okay. And do you know why she -- why</p> <p>15 Lisa was upset that she couldn't post on social</p> <p>16 media?</p> <p>17 A. I think she just wanted to share a nice</p> <p>18 place that she was traveling, that she was traveling,</p> <p>19 nothing to do with work.</p> <p>20 Q. Yeah, but obviously she was there on</p> <p>21 work, correct?</p> <p>22 A. She was there on work, but she also had</p> <p>23 downtime to herself.</p> <p>24 Q. Okay. But you would agree, though, if</p> <p>25 a company or business had security reasons for not</p>	<p style="text-align: right;">Page 191</p> <p>1 A. I don't ever remember her telling me</p> <p>2 she was overworked.</p> <p>3 Q. Okay. She writes to you: Gregg has me</p> <p>4 working like a dog. It's so hard to work with the</p> <p>5 kids.</p> <p>6 And you respond: Ugh, I can't even</p> <p>7 imagine. I was plowing through work this morning,</p> <p>8 now I'm ready for a lunch break.</p> <p>9 So it seems like you were working</p> <p>10 pretty hard as well, correct?</p> <p>11 A. Correct.</p> <p>12 Q. And would you agree that there was a</p> <p>13 heavy workload while you and Lisa were working at</p> <p>14 MEF?</p> <p>15 A. I would agree that we worked hard,</p> <p>16 yeah.</p> <p>17 Q. Okay. And you don't think you were</p> <p>18 singled out for heavy workload because of your</p> <p>19 gender, do you?</p> <p>20 A. For workload?</p> <p>21 Q. Yeah --</p> <p>22 A. No.</p> <p>23 Q. -- do you think you were -- okay.</p> <p>24 MR. GOLD: Let's go to the next</p> <p>25 exhibit.</p>



<p>Page 192</p> <p>1 BY MR. GOLD:</p> <p>2 Q. Moving along to March 29th, 2018:</p> <p>3 Marnie is assigning me a million things. Didn't</p> <p>4 Gregg leave for Florida? She is in boss mode.</p> <p>5 You write back: Total. But don't even</p> <p>6 worry about it or look at it yet. Bog stuff, she has</p> <p>7 taken the reigns, and she's definitely a delegator</p> <p>8 not a doer.</p> <p>9 What does bog stuff mean?</p> <p>10 A. Board of governors.</p> <p>11 Q. Okay. Got it. Okay. So it's another</p> <p>12 exchange of text messages where Lisa is complaining</p> <p>13 about the amount of work she has from Marnie?</p> <p>14 MR. CARSON: Objection.</p> <p>15 You can answer.</p> <p>16 THE WITNESS: I think she might</p> <p>17 have been on vacation during that time.</p> <p>18 BY MR. GOLD:</p> <p>19 Q. Okay. So Marnie assigning her work</p> <p>20 while she's out of the office on vacation?</p> <p>21 A. I believe Lisa was away when we started</p> <p>22 working on that.</p> <p>23 Q. What was it that you were working on,</p> <p>24 if you can recall?</p> <p>25 A. The board of governors meeting.</p>	<p>Page 194</p> <p>1 over Lisa, was that Lisa's impression?</p> <p>2 A. Yeah, that she was -- they were</p> <p>3 characteristics, yes.</p> <p>4 Q. And, in fact, was Marnie Lisa's boss?</p> <p>5 A. No.</p> <p>6 Q. No. Who was her boss, if she had a</p> <p>7 boss at all?</p> <p>8 A. Gregg.</p> <p>9 Q. And I thought you said, though, that --</p> <p>10 ultimately who ran the office? Daniel Pipes?</p> <p>11 A. No, Gregg.</p> <p>12 Q. Gregg ran the office -- he was -- he</p> <p>13 had more power than Daniel Pipes?</p> <p>14 A. As far as we knew in the office, yes.</p> <p>15 Q. And when you say as far as we knew, how</p> <p>16 would you know that?</p> <p>17 A. Because Gregg was the one who was</p> <p>18 telling us where orders were coming from, what was to</p> <p>19 be done, when it was to be done. Daniel had no parts</p> <p>20 in that. We rarely spoke to Daniel.</p> <p>21 Q. When you say he told us where the</p> <p>22 orders were coming from, where were they coming from?</p> <p>23 A. Him.</p> <p>24 Q. Okay. So he made it clear that when he</p> <p>25 asked things to be done by him they were -- the</p>
<p>Page 193</p> <p>1 Q. When does that usually take place?</p> <p>2 A. I think that one was in -- I don't</p> <p>3 remember. They're twice a year, but they're not</p> <p>4 always the -- it depends on their travel schedules.</p> <p>5 Q. And where does that generally take</p> <p>6 place at?</p> <p>7 A. New York, and then I think there is one</p> <p>8 in Philadelphia too.</p> <p>9 Q. Did you -- would you be attending that</p> <p>10 event or --</p> <p>11 A. No, I did not attend that.</p> <p>12 Q. Would Lisa be attending that event?</p> <p>13 A. No.</p> <p>14 Q. No. What exactly happens at a board of</p> <p>15 governors meeting?</p> <p>16 A. I've never attended one and I don't see</p> <p>17 what they -- or hear about what exactly they talk</p> <p>18 about. I just know the general financials and</p> <p>19 discussing what MEF has done throughout the year,</p> <p>20 things like that, but I don't know the specifics.</p> <p>21 Q. Do you know the nature of the work that</p> <p>22 Marnie was assigning to Lisa at the time?</p> <p>23 A. I'm not sure.</p> <p>24 Q. Okay. It's clear to me from these text</p> <p>25 messages that Marnie would act like she was a boss</p>	<p>Page 195</p> <p>1 orders were coming from him.</p> <p>2 A. Correct.</p> <p>3 Q. Correct? And he was the director,</p> <p>4 correct?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. So in terms of this board of</p> <p>7 governors meeting, what was Marnie's role in that</p> <p>8 meeting?</p> <p>9 A. As far as I remember, she was supposed</p> <p>10 to be getting -- she had to attend the meeting to</p> <p>11 discuss financials I believe because she did the</p> <p>12 accounting, so she was helping to just get documents</p> <p>13 together.</p> <p>14 Q. Okay. So she not only was HR, she was</p> <p>15 also part of the financial aspect of the -- of MEF?</p> <p>16 A. Correct.</p> <p>17 Q. Did she have a title that went along</p> <p>18 with that?</p> <p>19 A. I'm not sure what it was at -- I think</p> <p>20 -- I'm not sure what her title was at the -- that</p> <p>21 pertained to the finance portion, what the exact</p> <p>22 title was.</p> <p>23 Q. And did Marnie eventually separate from</p> <p>24 MEF?</p> <p>25 A. I haven't talked to Marnie since I left</p>

<p>Page 196</p> <p>1 there, so I'm not sure.</p> <p>2 Q. Who have you spoken with from MEF since</p> <p>3 you left? I know you talked to Matt, right? Matt</p> <p>4 Bennett?</p> <p>5 A. No, I have not talked to Matt Bennett</p> <p>6 since I left.</p> <p>7 Q. Oh, you have not. Okay. Who have you</p> <p>8 spoken with since you left?</p> <p>9 A. I've talked to Lisa, I've spoken to</p> <p>10 Delaney, and I think that might be it. I think</p> <p>11 that's it since I left.</p> <p>12 MR. GOLD: Let's go to Exhibit 10.</p> <p>13 BY MR. GOLD:</p> <p>14 Q. Starts off with: Why do I hate that</p> <p>15 she is giving me stuff with due dates.</p> <p>16 Is -- do you know if Lisa was referring</p> <p>17 to Marnie at the time?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And you write back: Trust me, I</p> <p>20 know. My inbox is flooded with Asana telling her --</p> <p>21 telling me to do a million things and she always</p> <p>22 wants to be piling on my plate. Thankfully Matt</p> <p>23 understands what I do and at least feels my pain.</p> <p>24 Again, are you referring to Marnie as</p> <p>25 well?</p>	<p>Page 198</p> <p>1 Q. Okay. When you say "the Marnie part is</p> <p>2 making you hate it more," is it pretty obvious at</p> <p>3 that point in time Lisa was thinking of leaving MEF?</p> <p>4 A. I don't know if she was seriously</p> <p>5 thinking about leaving at that point. She really</p> <p>6 liked the content portion of being in the mission,</p> <p>7 but I think it was just normal complaining.</p> <p>8 Q. Well, she said that -- if you go back</p> <p>9 to the top of that text message --</p> <p>10 MR. GOLD: Can you scroll up?</p> <p>11 Keep going up. Some more. Go back</p> <p>12 down.</p> <p>13 BY MR. GOLD:</p> <p>14 Q. Didn't she say "I need to look for a</p> <p>15 new job where I'm not an assistant"?</p> <p>16 A. I think that was on the page we were</p> <p>17 at, down --</p> <p>18 Q. Yeah.</p> <p>19 A. -- at the bottom.</p> <p>20 Q. And then you begged -- you said "don't</p> <p>21 leave."</p> <p>22 So you're saying that she wasn't happy</p> <p>23 but you don't know if she was actually going to</p> <p>24 leave; is that somewhat accurate?</p> <p>25 A. She -- I know that she had always</p>
<p>Page 197</p> <p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 MR. GOLD: Could you scroll down?</p> <p>4 BY MR. GOLD:</p> <p>5 Q. She says: I need to be -- I need to</p> <p>6 look for a new job where I'm not an assistant. A</p> <p>7 real policy job.</p> <p>8 You say: Don't leave me.</p> <p>9 She says: I have had it with note</p> <p>10 taking and agenda writing.</p> <p>11 Again, is she referring to Marnie in</p> <p>12 this text message?</p> <p>13 A. No.</p> <p>14 Q. Well, you write back: Don't think</p> <p>15 about it, the Marnie part is making you hate it more.</p> <p>16 A. The work. She's talking about the work</p> <p>17 here.</p> <p>18 Q. Okay. But who is the -- she says: I</p> <p>19 have had it with note taking and agenda writing.</p> <p>20 A. That's what she was doing at the time.</p> <p>21 Q. And who gave her that work to do?</p> <p>22 A. She would take notes in our development</p> <p>23 meetings, in -- in all kinds of company meetings for</p> <p>24 Gregg and -- and the agenda writing was for this</p> <p>25 event specifically but it was just part of her --</p>	<p>Page 199</p> <p>1 talked about with Gregg when she first got hired that</p> <p>2 she wanted more of a content role and they had</p> <p>3 discussed that she would start as the executive</p> <p>4 liaison and then that could transition into more. I</p> <p>5 think she was just getting impatient with getting to</p> <p>6 the content part because that was her -- what she</p> <p>7 really liked about the job.</p> <p>8 Q. And you would agree, though, she also</p> <p>9 hated the Marnie part of the job, correct? You said</p> <p>10 that.</p> <p>11 A. When Marnie was delegating.</p> <p>12 Q. Yeah, you said "don't think about it</p> <p>13 now, the Marnie part is making you hate it more,"</p> <p>14 correct?</p> <p>15 A. Correct, I said that.</p> <p>16 Q. Okay.</p> <p>17 MR. GOLD: Let's go to Exhibit 11.</p> <p>18 BY MR. GOLD:</p> <p>19 Q. Again she says to you in an exchange of</p> <p>20 text messages "I'm going to punch Marnie and quit."</p> <p>21 This is now March 30th, 2018. Do you believe that</p> <p>22 she was expressing her frustration with Marnie or</p> <p>23 again was she just reacting to Marnie's behavior</p> <p>24 towards her?</p> <p>25 A. I think she was just -- but, again, I'm</p>

<p>Page 200</p> <p>1 just guessing what she was feeling right now. I 2 mean, I can tell you guesses. 3 Q. Okay. Well, she -- you have a lot of 4 contact with her. I mean, next message, if you move 5 down, you say: Is she e-mailing you again? 6 She says: She sent me an e-mail asking 7 for the -- asking for minutes from last year when I 8 wasn't there and for this year which I didn't do. 9 Fucking look in the Dropbox bitch. 10 Are you telling me from that you could 11 assume she liked working with Marnie? 12 A. No, I think she was frustrated at the 13 time. 14 Q. Well, she said she wanted to quit, she 15 said she wanted to punch Marnie, and now she says -- 16 refers to her as a bitch. 17 A. I think she was just frustrated with 18 the planning of this event in general. 19 Q. Okay. You and her never had any 20 conversations about -- you know, she never said to 21 you I want to quit because of Marnie except for what 22 appears in these text messages. 23 A. Not seriously. 24 Q. Well, what makes you think she wasn't 25 serious?</p>	<p>Page 202</p> <p>1 So your observation was that Marnie was 2 on some kind of a power trip? 3 A. Yes. 4 Q. What does that mean? 5 A. She was leading the project and that's 6 not something that's normally in her role, so she was 7 just going a bit overboard with it. 8 Q. Okay. Do you know what the word MAJA 9 boss means? Is that -- do you understand what that 10 -- 11 A. It's slang for major. 12 Q. Okay. Got it. 13 MR. GOLD: Can you scroll down 14 some more, Matt? 15 BY MR. GOLD: 16 Q. Okay, Exhibit 12. This one is dated -- 17 now we're into April 2018. She says: I was up so 18 late last night working on this power point, 19 accidentally deleted it. I actually cried. Vasili 20 tried to get it back it didn't happen. I'm halfway 21 done. It's 6 I'm thinking of ramping up my heart and 22 taking a trip to the ER to postpone. 23 What exactly was that about, if you can 24 recall? 25 A. She had a school assignment that got</p>
<p>Page 201</p> <p>1 A. Because she would -- it wasn't 2 something that she continuously talked about. 3 Q. Okay. When did she stop talking about 4 it? 5 A. I don't know exactly. She would be 6 fine in a conversation or two. 7 MR. GOLD: Okay. Go down further 8 in this text message. Stop. 9 BY MR. GOLD: 10 Q. "I'm actively looking for a new job. I 11 hate this type of work anyway." 12 And you respond: Don't even worry 13 about it, it's not needed right this second, or week, 14 it's needed for the 16th. 15 MR. GOLD: Go ahead, scroll down. 16 BY MR. GOLD: 17 Q. She says: She is in MAJA boss mode. 18 She sent an e-mail out yesterday about letting her 19 know when we change schedules and that's cause Matt 20 didn't come in yesterday and told me but not her. 21 And you say: Yeah, stay your ass on 22 the beach and don't mind her. 23 Then she writes -- you write: I know, 24 she's on a power trip, don't let it get to you. 25 Somebody get this girl a mimosa.</p>	<p>Page 203</p> <p>1 deleted. 2 Q. So this wasn't -- this wasn't MEF work? 3 A. No, I don't think so. 4 Q. Okay. So what did you think about her 5 thought of running over to the ER to postpone having 6 to turn in the work when it had been deleted? 7 A. I mean, I thought she was just 8 exaggerating that part because she was so upset. 9 Q. Okay. Do you know whether she went to 10 the ER that night? 11 A. I don't know. 12 Q. You write -- 13 A. I don't remember. 14 Q. You write: Holy shit. Oh my God. How 15 is it even possible it didn't automatically save, I 16 would have cried too. Don't make your heart go 17 crazy. You know if a trip to the ER would get you 18 out of -- get you out of jail -- jail free card you 19 could just go and say your heart was acting up. 20 So were you encouraging her to go to 21 the ER and misrepresent what actually occurred with 22 whatever paper she was working on? 23 A. I wasn't seriously intending that. I 24 didn't think that she was even serious when she was 25 talking about going to the ER.</p>

<p style="text-align: right;">Page 204</p> <p>1 Q. Okay.</p> <p>2 A. I was just pointing out the absurdity</p> <p>3 was ironic.</p> <p>4 Q. And she writes back: My heart was</p> <p>5 insane last night. I thought I was going to die.</p> <p>6 Adderall, coffee, anxiety, anger. That's what gave</p> <p>7 me the idea.</p> <p>8 MR. GOLD: Can you scroll up,</p> <p>9 Matt?</p> <p>10 BY MR. GOLD:</p> <p>11 Q. So your recollection this had to do</p> <p>12 with a project for school, not for MEF?</p> <p>13 A. I think so.</p> <p>14 Q. And you thought she was kidding about</p> <p>15 faking a certain medical condition to avoid having to</p> <p>16 turn the paper in on time?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Had she ever done that before,</p> <p>19 suggested that she would engage in some deceit or</p> <p>20 misrepresentation as an excuse to not get something</p> <p>21 in by a certain deadline?</p> <p>22 MR. CARSON: Objection. Assuming</p> <p>23 facts not in evidence.</p> <p>24 Mischaracterization of prior testimony.</p> <p>25 Object to form.</p>	<p style="text-align: right;">Page 206</p> <p>1 Q. My question is, in your interactions</p> <p>2 with her while you were working at MEF had she ever</p> <p>3 engaged in any acts of deception or</p> <p>4 misrepresentation?</p> <p>5 A. Not that I can think of.</p> <p>6 Q. Okay.</p> <p>7 MR. GOLD: Let's go to the next</p> <p>8 exhibit then, Exhibit 13.</p> <p>9 THE WITNESS: Okay.</p> <p>10 BY MR. GOLD:</p> <p>11 Q. Okay. Was there a point in time when</p> <p>12 Lisa sent someone a text message and represented it</p> <p>13 was actually coming from her husband, Vasili?</p> <p>14 A. I don't know.</p> <p>15 Q. Okay. I'll come back to that. You</p> <p>16 don't know of any such situation where that occurred.</p> <p>17 A. Not that I remember.</p> <p>18 Q. Okay. We'll get to that.</p> <p>19 Okay. Exhibit 13. She says: I want</p> <p>20 to kill Gregg. Are you up?</p> <p>21 Now we're at -- what time -- this is in</p> <p>22 the early morning on May 4th, 2018?</p> <p>23 A. Okay.</p> <p>24 Q. What time did -- what time was it when</p> <p>25 you got that text message?</p>
<p style="text-align: right;">Page 205</p> <p>1 You can answer.</p> <p>2 THE WITNESS: No, and she wasn't</p> <p>3 being serious in that moment.</p> <p>4 BY MR. GOLD:</p> <p>5 Q. Well, what if she was being serious?</p> <p>6 MR. CARSON: Objection. What do</p> <p>7 you mean what if she was being serious?</p> <p>8 BY MR. GOLD:</p> <p>9 Q. How do you know she wasn't being</p> <p>10 serious? How do you know she was kidding?</p> <p>11 MR. CARSON: She just testified</p> <p>12 that's what she -- that's what --</p> <p>13 BY MR. GOLD:</p> <p>14 Q. So your perception she was kidding and</p> <p>15 she wasn't going to do that, correct?</p> <p>16 MR. CARSON: Objection. Asked and</p> <p>17 answered.</p> <p>18 BY MR. GOLD:</p> <p>19 Q. Okay. Had you ever --</p> <p>20 MR. CARSON: The other thing, too,</p> <p>21 is that you guys already asked her</p> <p>22 questions about --</p> <p>23 MR. GOLD: I have another</p> <p>24 question.</p> <p>25 BY MR. GOLD:</p>	<p style="text-align: right;">Page 207</p> <p>1 A. Looks like almost 2 a.m. from this.</p> <p>2 Q. Okay. And I guess you were awake. You</p> <p>3 responded: Yeah, what's he doing.</p> <p>4 And then you say: You only had one.</p> <p>5 I'm sorry.</p> <p>6 What does that mean?</p> <p>7 A. I'm not sure.</p> <p>8 Q. Okay. And then she comes back -- "I'm</p> <p>9 going to kill him."</p> <p>10 MR. GOLD: Go ahead -- can you</p> <p>11 scroll up? Yeah.</p> <p>12 BY MR. GOLD:</p> <p>13 Q. "What I have on my plate this week,"</p> <p>14 and she gives you a rundown of what she has to do.</p> <p>15 "I'm genuinely frustrated. This is exactly what</p> <p>16 we're talking about in meeting. How would I have</p> <p>17 ever" -- "how would I ever know you wanted all of</p> <p>18 that by tomorrow? It's like you push people to</p> <p>19 'grow' but you give them no guidance and get mad when</p> <p>20 they don't deliver or meet your expectations."</p> <p>21 Is she referring to Gregg in that text</p> <p>22 message?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And --</p> <p>25 MR. GOLD: Keep scrolling down.</p>



<p>Page 208</p> <p>1 BY MR. GOLD:</p> <p>2 Q. You say: Are you okay?</p> <p>3 "I'm better. I need to do this paper</p> <p>4 and not kill Marnie."</p> <p>5 Is this the paper we were talking about</p> <p>6 before for school or is this another paper?</p> <p>7 A. I'm not sure.</p> <p>8 Q. Okay. And then you say: When she</p> <p>9 comes in here in the mornings, she goes around to see</p> <p>10 who's here. I want to kill her. Do your paper,</p> <p>11 don't think about these mongrels.</p> <p>12 Are you referring to Marnie in that</p> <p>13 text?</p> <p>14 A. And Gregg.</p> <p>15 Q. Well, you say "when she comes in here,"</p> <p>16 so you're talking -- when you say Gregg, you mean</p> <p>17 what, the mongrel?</p> <p>18 A. Yes.</p> <p>19 Q. Who else?</p> <p>20 A. Who else what?</p> <p>21 Q. You say -- it's plural, so what other</p> <p>22 mongrels were there?</p> <p>23 A. Marnie and Gregg.</p> <p>24 Q. Just the two of them. Okay. So is it</p> <p>25 -- would you say that -- are these complaints</p>	<p>Page 210</p> <p>1 Q. Okay. Well, that has to do with I</p> <p>2 guess management style versus -- that wasn't -- you</p> <p>3 wouldn't consider that to be sexual harassment, would</p> <p>4 you?</p> <p>5 A. Some of it was forms of harassment when</p> <p>6 he would do it.</p> <p>7 Q. No, I asked you, ma'am, was that</p> <p>8 motivated by reason of her gender?</p> <p>9 MR. CARSON: Objection. Asked and</p> <p>10 answered.</p> <p>11 BY MR. GOLD:</p> <p>12 Q. Okay. What proof do you have that that</p> <p>13 was motivated by reason of her gender?</p> <p>14 A. I didn't say that this specific thing</p> <p>15 was motivated by her gender. I just think that his</p> <p>16 -- everything that he did in conjunction with the</p> <p>17 other things that he did all compiled together, like</p> <p>18 you can't just take one thing at a time and say --</p> <p>19 like the phone calls late at night or this one time</p> <p>20 that he assigned her all of these things, how are</p> <p>21 those -- all together along with the way he would</p> <p>22 touch us or the way he would make you go on forced</p> <p>23 dates outside of hours with him and all of those</p> <p>24 things together; it's not just singled out.</p> <p>25 Q. Okay. So giving excessive work to you</p>
<p>Page 209</p> <p>1 regarding -- I think you answered these complaints</p> <p>2 are regarding the workload that Gregg gave her, not</p> <p>3 necessarily what Marnie had given her, correct?</p> <p>4 A. The complaint about what workload?</p> <p>5 Q. The workload that she's complaining</p> <p>6 about right in here where she wants to kill Gregg</p> <p>7 because she has too much work.</p> <p>8 A. I'm sorry, I'm not seeing that on the</p> <p>9 screen.</p> <p>10 MR. GOLD: Go back -- scroll back</p> <p>11 up.</p> <p>12 THE WITNESS: Oh, you're talking</p> <p>13 about the last one.</p> <p>14 BY MR. GOLD:</p> <p>15 Q. Yeah, "here is what I" -- she says "I</p> <p>16 want to kill Gregg. Here is what I have on my</p> <p>17 plate."</p> <p>18 She's complaining about the workload,</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. Okay.</p> <p>22 A. And also the way that Gregg gives the</p> <p>23 workload but then doesn't explain exactly what he</p> <p>24 wants from things, so it takes ten times longer and</p> <p>25 ten times over to do the workloads.</p>	<p>Page 211</p> <p>1 or Lisa in your mind was another form of sex</p> <p>2 discrimination.</p> <p>3 A. It was a form of discrimination in how</p> <p>4 he was feeling at that time, if he was feeling like</p> <p>5 your reactions to his touching were not good or good.</p> <p>6 Q. So you're saying he would give you more</p> <p>7 work if you resisted his touchings; is that what</p> <p>8 you're trying to say?</p> <p>9 A. If he was unhappy with you at that</p> <p>10 time, if he felt like he wasn't getting a good</p> <p>11 reaction from you when he would tell you to sit on</p> <p>12 the couch and have a personal conversation with him</p> <p>13 or talk about your dating life or things like that,</p> <p>14 if he didn't feel like it was super close and he was</p> <p>15 getting what he wanted, then, yes, it would come back</p> <p>16 and be extra work.</p> <p>17 Q. Okay. Now we're talking in May of 2018</p> <p>18 if you felt that way and if Lisa felt that way why</p> <p>19 did you not register a complaint with Daniel Pipes or</p> <p>20 Marnie O'Brien?</p> <p>21 A. I mean, I've said this answer multiple</p> <p>22 times. Are we just going to keep saying the same</p> <p>23 thing?</p> <p>24 Q. That's the question, ma'am. The</p> <p>25 question is why did you not complain to Marnie</p>



<p style="text-align: right;">Page 212</p> <p>1 O'Brien or Daniel Pipes if that's the way you felt in 2 May of 2018?</p> <p>3 MR. CARSON: Objection. Asked and 4 answered. 5 You can answer again. 6 THE WITNESS: There were multiple 7 reasons, one being feeling like all of 8 these things -- I mean, we weren't 9 talking about all of them together at 10 that time, you felt very much alone in 11 what was happening to you, and so I 12 didn't go because I didn't feel like me 13 alone was meant -- it would be powerful 14 enough and I thought that I would just 15 be fired like they said happened to 16 Tiffany Lee, which is exactly what Matt 17 told me not to do in the beginning, he 18 said don't make any complaints because 19 they won't matter, they'll tell 20 everybody to lie and they'll get you to 21 leave. 22 BY MR. GOLD: 23 Q. Okay. Now, when did you last have your 24 forced date with Gregg Roman before May of 2018? 25 A. I mean, I don't know exactly when it</p>	<p style="text-align: right;">Page 214</p> <p>1 him to social distance and sit on the balcony and you 2 can sit on the first floor?</p> <p>3 A. Because that's easier said than done 4 when you're talking about your direct supervisor who 5 is in charge of all of your work and all of the 6 things you do and the job that you have and your 7 paycheck and you just -- I had already heard these 8 horror stories, I didn't want to just get fired for 9 something as silly as just going though -- to a 10 movie. I thought I would just sit through it and -- 11 Q. Well -- you sat right through it, 12 correct? 13 A. I did. 14 Q. And did he make any sexual advances 15 towards you? 16 A. At the movie theater? 17 MR. CARSON: Objection. 18 BY MR. GOLD: 19 Q. Yeah, at the movie theater. 20 A. I mean, it was already inappropriate 21 enough, again, to me, I felt, sitting next to me in 22 an empty movie theater. 23 Q. Why wasn't that on the list of your 24 things you told Daniel Pipes back in November of 25 2018?</p>
<p style="text-align: right;">Page 213</p> <p>1 was. They happened all the time. He would do it 2 regularly. 3 Q. Where did you go with him? To dinner? 4 Bowling? See a movie? 5 A. To -- he made me go to the movies once 6 with him during work hours. 7 Q. What did you see? Star Trek? 8 A. Star Wars I think. 9 Q. Star Wars? Okay. So you felt 10 compelled to go to a movie with him? 11 A. He said I had to. 12 Q. Okay. And did you voice your 13 opposition to going to that movie with him? 14 A. No, it was within the first two months 15 of me working there and -- 16 Q. Okay. So did he make any sexual moves 17 towards you, any advances towards you, during the 18 movie? 19 A. I mean, it was just uncomfortable. He 20 was sitting directly next to me. 21 Q. Well, where did you want him to sit? 22 Behind you? 23 A. It was an empty movie theater. He 24 could have sat behind me. 25 Q. Well, then why -- why didn't you tell</p>	<p style="text-align: right;">Page 215</p> <p>1 A. There is a lot to tell. I mean, we 2 made it pretty -- I thought saying all of the things 3 that we had told him had happened -- I mean, I 4 thought once I told him that Gregg had touched me at 5 AIPAC on the couch, you know, his hand on my thigh 6 pulling me onto his lap would be all that anyone 7 would need to hear at that point. It didn't seem 8 like we had to go through the whole this is what he 9 does on a daily basis, but we continued to do so, but 10 it's hard -- there were so many things that he did, 11 it's hard to remember them all every single time 12 you're talking. 13 Q. Were you alone with Gregg at the movie 14 or was Marnie there with you? 15 A. Marnie was there as well. 16 Q. Okay. So did he make any sexual 17 advances towards Marnie at the movie theater? 18 A. I don't know. 19 Q. Okay. So in your mind that visit to 20 the movie theater was sexually motivated; is that 21 your testimony? 22 A. Yeah, it was forcing two females to go 23 to the movies with him during -- 24 Q. To have -- and what would be the sexual 25 motivation? Just because you're females?</p>

<p>Page 216</p> <p>1 A. And along with while he was also, you 2 know, doing other things in the office. It's not 3 just like nothing else ever happened and he just made 4 us go to the movies with him the one day. It was in 5 conjunction with everything else happening.</p> <p>6 Q. So why did you go to the movie theater 7 with him? I'll withdraw --</p> <p>8 A. I just answered that.</p> <p>9 Q. -- the question. I'll withdraw the 10 question. It's --</p> <p>11 So did Marnie -- well, Marnie was the 12 head of HR, so why did she go to the movie theater 13 with Gregg and you, do you know?</p> <p>14 A. I mean, as far as -- as far as I knew 15 at that point they still had a very good friendly 16 relationship with each other.</p> <p>17 Q. Okay. So you -- so you were ambivalent 18 to register a complaint with Marnie for that reason?</p> <p>19 A. For multiple reasons, for the reasons I 20 just stated before.</p> <p>21 Q. Did you tell Matt -- did you tell Matt 22 Bennett that you thought that this visit to the movie 23 theater was sexually motivated?</p> <p>24 A. I told Matt a lot of the things that 25 Gregg did that I thought were inappropriate.</p>	<p>Page 218</p> <p>1 MR. GOLD: Okay. That's good to 2 hear. 3 Let's go to Exhibit 13.</p> <p>4 BY MR. GOLD: 5 Q. Starts off with: You okay? 6 And then she responds: I'm better. I 7 need to do this paper and not kill Marnie. 8 I think we -- 9 MR. GOLD: Keep -- next -- I mean 10 Exhibit 14. I'm sorry. I got the wrong 11 -- we already had that exhibit. 14.</p> <p>12 BY MR. GOLD: 13 Q. Okay. Here we go. Starts off with 14 something about the texts from Israel, and you 15 respond: I do have those texts. 16 Do you know -- this is now in May of 17 2018. 18 And then you say: I just figured 19 better safe than sorry. 20 And then she says to you: Good. 21 Screen shot that shit and lee it. 22 What does "lee it" mean? 23 A. I think it's a typo. 24 Q. What's the word that the typo is? 25 A. I would assume send.</p>
<p>Page 217</p> <p>1 Q. Well, I'm only asking about this one -- 2 I'm asking about the movie visit, though. Did you 3 tell Matt about that?</p> <p>4 A. I don't remember if I told him about 5 the movie or not.</p> <p>6 Q. Okay. Okay. Got it. All right. So 7 --</p> <p>8 A. Gregg had instructed us not to tell 9 anyone, so I don't know if I --</p> <p>10 Q. And you did everything you were told, 11 right? Because if Gregg would have told you to jump 12 off the roof, you would have jumped off the roof, 13 right?</p> <p>14 A. I mean, that's absurd.</p> <p>15 MR. CARSON: Object -- object to 16 form. 17 You can answer. 18 I think the question is if Gregg 19 told you to jump off the roof would you 20 have jumped off the roof.</p> <p>21 MR. GOLD: Yeah, that's the 22 question.</p> <p>23 MR. CARSON: So is the answer yes 24 or no? 25 THE WITNESS: No. That's absurd.</p>	<p>Page 219</p> <p>1 Q. Oh -- okay. "Good. Screen shot that 2 shit and send it"? 3 Do you know why she wanted -- do you 4 know why she asked you for those texts from Israel?</p> <p>5 A. I'm not sure.</p> <p>6 Q. Did you send it to her that day?</p> <p>7 A. I don't remember.</p> <p>8 Q. Did you take a screen shot of those 9 texts at any point in time?</p> <p>10 A. I did.</p> <p>11 Q. Okay. When did you do that?</p> <p>12 A. After she sent them to me.</p> <p>13 Q. Okay. And the reason why she wanted 14 you to screen shot it is no longer on her phone. Did 15 she actually delete it herself?</p> <p>16 A. I'm not sure.</p> <p>17 Q. Do you have any personal knowledge as 18 to whether Gregg ever hacked into Lisa's phone?</p> <p>19 A. I don't know.</p> <p>20 Q. Did Gregg ever hack into your phone?</p> <p>21 A. Not that I know of.</p> <p>22 MR. GOLD: Okay. Scroll down, 23 Matt. 24 BY MR. GOLD: 25 Q. Okay. She says then: Keep it. I</p>

<p>Page 220</p> <p>1 deleted mine in case he got paranoid and went through 2 my phone.</p> <p>3 I covered that with you.</p> <p>4 MR. GOLD: Keep going. Okay.</p> <p>5 Let's go to Exhibit 15.</p> <p>6 BY MR. GOLD:</p> <p>7 Q. She says: I just called Gregg in 8 Israel and told him I'm at my breaking point and I'm 9 about to quit.</p> <p>10 Do you know the context in which that 11 conversation took place between you and Lisa?</p> <p>12 A. No, I don't remember exactly what it 13 was about.</p> <p>14 MR. GOLD: Keep going down here.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. It says: Can you talk. I just got off 17 the phone.</p> <p>18 You said: Yeah.</p> <p>19 And then it says: I told him tired of 20 morning inserting herself and everybody's job 21 including mine.</p> <p>22 Is that in reference to Marnie again?</p> <p>23 A. I believe so.</p> <p>24 Q. Okay. So now it's May of 2018, she's 25 still complaining about Marnie; would you agree?</p>	<p>Page 222</p> <p>1 focusing more on Gregg, is that what's occurring 2 here?</p> <p>3 A. I don't think there was ever a shift, I 4 think that there was always issues with Gregg, but in 5 this particular instance that's who she's talking 6 about, yes.</p> <p>7 Q. Okay. And what is the subject matter 8 anyway that she's complaining about, do you know? Do 9 you have any recollection?</p> <p>10 A. I don't know.</p> <p>11 MR. GOLD: Okay. Keep scrolling 12 down.</p> <p>13 BY MR. GOLD:</p> <p>14 Q. It says something that she's preparing 15 a paper of sorts. You have no recollection what 16 that's about.</p> <p>17 A. No.</p> <p>18 Q. Okay. And you understand she's 19 complaining about workload again, getting work done 20 at a certain point in time. Nothing in that text 21 would you consider to be sexually offensive, would 22 you?</p> <p>23 A. Specific to that text, no.</p> <p>24 Q. Right.</p> <p>25 MR. GOLD: Go back to -- go back</p>
<p>Page 221</p> <p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 MR. GOLD: Scroll down. Stop.</p> <p>4 Let's see. Keep going. Keep going. 5 Stop.</p> <p>6 BY MR. GOLD:</p> <p>7 Q. It says here: I called her on the Matt 8 thing and she had an explanation for that but 9 admitted it too. I said it's an awful work 10 environment. She said well Gregg has had people stab 11 him in the back. I said that's on him. Does she 12 hear the way she -- the way he speaks to people?</p> <p>13 And then you say -- she says: He's 14 exacerbating the problem. And he said that he 15 insults my intelligence by thinking I'm stupid to 16 know what's up.</p> <p>17 And then you say: I think -- if he 18 thinks being sneaky and manipulative is going to stop 19 people from stabbing him in the back he's got another 20 thing coming.</p> <p>21 So are you now -- are we talking about 22 Gregg now in this exchange?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. So now it looks like Gregg is 25 her -- she's shifting away from Marnie now and</p>	<p>Page 223</p> <p>1 to Exhibit 14 for one second here, make 2 sure we don't skip over -- oh, we're at 3 15 now? Okay, good.</p> <p>4 BY MR. GOLD:</p> <p>5 Q. She says: I just called Gregg in 6 Israel --</p> <p>7 A. We just did this one.</p> <p>8 Q. We did -- we're going to keep -- move 9 on to the bottom of this text message, though, I want 10 to --</p> <p>11 MR. GOLD: Stop. Keep going. 12 Stop.</p> <p>13 BY MR. GOLD:</p> <p>14 Q. Okay. Here is what you write: Me 15 neither, but I've put them in mail -- mailchimp 16 before so I see there is a list created there for 17 conference call subscribers, and the RSVPs go to 18 Thelma to create a link and campaign, so I used to 19 get e-mails to enter from people who wanted to listen 20 so I recognized --</p> <p>21 So the work she was doing was clearly 22 MEF work, correct?</p> <p>23 A. I'm not sure where -- I mean, I know 24 I'm talking about MEF work in that text message.</p> <p>25 Q. Okay. And you don't know if she is?</p>

<p style="text-align: right;">Page 224</p> <p>1 A. In what instance? I'm not sure.</p> <p>2 Q. In Exhibit 16, you're referring to MEF</p> <p>3 work, right?</p> <p>4 A. Correct.</p> <p>5 Q. Is this again with the board of</p> <p>6 governors meeting or is this something else?</p> <p>7 A. I don't think that has to do with the</p> <p>8 board of governors.</p> <p>9 Q. Okay. Do you know what it had to do</p> <p>10 with?</p> <p>11 A. Mailchimp is a platform we use for</p> <p>12 invites and articles and things like that. I'm not</p> <p>13 sure specifically what that pertains to.</p> <p>14 Q. Okay.</p> <p>15 MR. GOLD. Keep going. Keep</p> <p>16 going. Stop. Go ahead, keep scrolling</p> <p>17 down. Scroll down. Stop. Keep</p> <p>18 scrolling down. Keep going. Keep</p> <p>19 going. Scroll down. Okay. Stop.</p> <p>20 Scroll -- stop.</p> <p>21 BY MR. GOLD:</p> <p>22 Q. Okay. Looks as now like -- this is now</p> <p>23 June of 2018, and this is Exhibit 18 I believe.</p> <p>24 Yeah. It says -- you say to her: I don't know if I</p> <p>25 can bring myself to spend that for literally one day.</p>	<p style="text-align: right;">Page 226</p> <p>1 A. Because Lisa was willing to pay to go</p> <p>2 for herself.</p> <p>3 Q. Okay. Okay. So --</p> <p>4 MR. GOLD: Stop.</p> <p>5 BY MR. GOLD:</p> <p>6 Q. And Lisa says: He's definitely paying</p> <p>7 for your ticket.</p> <p>8 Again, is that with reference to</p> <p>9 Raheem?</p> <p>10 A. Yes.</p> <p>11 Q. Okay.</p> <p>12 MR. GOLD: Keep going.</p> <p>13 BY MR. GOLD:</p> <p>14 Q. "He called me and talked about other</p> <p>15 stuff. Said he would talk tomorrow." And she says I</p> <p>16 need to book the flights. He said he would talk to</p> <p>17 you tonight. I know DP could give two shifts.</p> <p>18 Is this now in reference to a</p> <p>19 conversation had with Gregg?</p> <p>20 A. This is about Gregg, yes.</p> <p>21 Q. Okay. And looks like they never</p> <p>22 thought that -- appears to me they thought Gregg</p> <p>23 would never pay for the flight.</p> <p>24 You say: Yeah, DP doesn't care --</p> <p>25 A. No, he wasn't going to let us go at</p>
<p style="text-align: right;">Page 225</p> <p>1 She says: I know. What if we throw</p> <p>2 another day in there.</p> <p>3 What exactly were you talking about,</p> <p>4 this trip to the UK?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And when was this trip to take</p> <p>7 place? That weekend?</p> <p>8 A. I believe the 9th.</p> <p>9 Q. Okay. So this is -- so you're planning</p> <p>10 ahead for the week for the 9th.</p> <p>11 MR. GOLD: Go ahead.</p> <p>12 BY MR. GOLD:</p> <p>13 Q. "I know. It looks like Raheem is</p> <p>14 ducking out cause Gregg won't pay him. I won't get</p> <p>15 connects if he isn't going."</p> <p>16 MR. GOLD: Keep going. Go ahead.</p> <p>17 BY MR. GOLD:</p> <p>18 Q. "Raheem said he'd pay for you."</p> <p>19 So Raheem was willing to pay for both</p> <p>20 you and Lisa to go to the UK on the 9th?</p> <p>21 A. Just for me, for my plane ticket.</p> <p>22 Q. Just for you.</p> <p>23 A. Uh-huh.</p> <p>24 Q. Do you know why just for you and not</p> <p>25 Lisa?</p>	<p style="text-align: right;">Page 227</p> <p>1 all.</p> <p>2 Q. Not go at all. Okay. And then you</p> <p>3 say: Yeah --</p> <p>4 A. It wasn't about them paying.</p> <p>5 Q. -- yeah, Daniel -- DP doesn't care what</p> <p>6 the fuck you do -- what -- you and I do on our own</p> <p>7 time. Why wouldn't he just say one way or another on</p> <p>8 the phone.</p> <p>9 And then she says: I want to write</p> <p>10 this.</p> <p>11 And she says: It is that you don't</p> <p>12 want us at the march or off Monday? It's about the</p> <p>13 day I look for flights that come home on Sunday.</p> <p>14 It's about what we do on our own time then we should</p> <p>15 talk about that.</p> <p>16 MR. GOLD: Scroll down. Stop.</p> <p>17 BY MR. GOLD:</p> <p>18 Q. You say: Why does he just want to be</p> <p>19 difficult with everything?</p> <p>20 And then she says: I'm quitting</p> <p>21 they're all nuts.</p> <p>22 And you say: Does he say anything?</p> <p>23 She says: No but I just got into a</p> <p>24 minor tiff with Marnie.</p> <p>25 Do you know what she's talking about</p>



<p>Page 228</p> <p>1 there?</p> <p>2 A. No.</p> <p>3 Q. Okay. This conversation has to do with</p> <p>4 whether Gregg is going to pay for any part of the</p> <p>5 trip, is that it?</p> <p>6 A. No, it was whether he was going to let</p> <p>7 us go or not.</p> <p>8 Q. Oh, okay. And you were working on the</p> <p>9 assumption that he wasn't going to let you go,</p> <p>10 correct?</p> <p>11 A. He was saying that he might not let us.</p> <p>12 Q. Okay. Next one says -- Lisa says: Ya.</p> <p>13 I was just asking if he doesn't approve the time off</p> <p>14 on Monday am I allowed to do what I want on my own</p> <p>15 time?</p> <p>16 MR. GOLD: Scroll up.</p> <p>17 BY MR. GOLD:</p> <p>18 Q. "She was" -- "she was like if you want</p> <p>19 to get technical about the manual you didn't request</p> <p>20 time off" --</p> <p>21 You're referring now to Marnie?</p> <p>22 A. Lisa's saying that, yes.</p> <p>23 Q. Yeah, because Marnie said you have to</p> <p>24 follow the protocol in the manual?</p> <p>25 A. She's saying if you want to get</p>	<p>Page 230</p> <p>1 BY MR. GOLD:</p> <p>2 Q. "Making major shit happen. Who books a</p> <p>3 trip on a Monday to fly to London on a weekend?"</p> <p>4 And she says: We do.</p> <p>5 So I guess you two sound like you're</p> <p>6 pretty ecstatic about going to London. Was this for</p> <p>7 a rally or was this for some other reason?</p> <p>8 A. There was a rally taking place that</p> <p>9 weekend. The two of us going started out as a</p> <p>10 personal trip and when MEF said that they would pay</p> <p>11 for half, then it became we would report back to</p> <p>12 Daniel on -- on what we saw.</p> <p>13 Q. And earlier today I had asked you</p> <p>14 whether -- you know, about the first trip to the UK</p> <p>15 where she met -- where Lisa met Tommy -- Danny Rommo</p> <p>16 -- or Danny Thomas, rather. Is this where it took</p> <p>17 place, that weekend when you left for London?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And when you were with her at</p> <p>20 the rally were you involved with -- did you meet</p> <p>21 Robinson and Danny Thomas?</p> <p>22 A. Not Tommy Robinson, he was in jail at</p> <p>23 the time, but --</p> <p>24 Q. He was in jail. Okay.</p> <p>25 A. -- I met Danny.</p>
<p>Page 229</p> <p>1 technical about it, yes.</p> <p>2 Q. Okay. Was Marnie involved in these</p> <p>3 discussions as well as Gregg?</p> <p>4 A. I believe Lisa had went to her to see</p> <p>5 if we would be able to take that Monday off.</p> <p>6 Q. Okay. All right. And then you write</p> <p>7 back: Oh yeah, she's a hundred percent just ready to</p> <p>8 fight.</p> <p>9 And then she writes back: No. Still</p> <p>10 waiting for Gregg to give me a yes or no. He could</p> <p>11 ruin a picnic.</p> <p>12 MR. GOLD: Keep going.</p> <p>13 BY MR. GOLD:</p> <p>14 Q. And then she says: We're going.</p> <p>15 I guess at that point she heard from</p> <p>16 Gregg and he gave his -- gave the green light on it,</p> <p>17 I take it?</p> <p>18 A. Yeah.</p> <p>19 Q. And paid for half your tickets?</p> <p>20 A. We found that out later.</p> <p>21 Q. Okay. And then she went and booked the</p> <p>22 flight.</p> <p>23 MR. GOLD: Keep going. And now</p> <p>24 we're on Exhibit -- we're still on</p> <p>25 Exhibit 18. Stop there.</p>	<p>Page 231</p> <p>1 Q. Okay. So what was your understanding</p> <p>2 of what the rally was for?</p> <p>3 A. It was for awareness of what had</p> <p>4 happened to Tommy Robinson and for backing --</p> <p>5 Q. Okay.</p> <p>6 A. -- the public.</p> <p>7 Q. And was there any -- did Gregg Roman</p> <p>8 ever express any apprehension about MEF getting</p> <p>9 involved with Tommy Robinson at that juncture?</p> <p>10 A. Not that he talked to me about.</p> <p>11 Q. And I guess Lisa didn't talk to you</p> <p>12 about that either?</p> <p>13 A. No.</p> <p>14 Q. Okay. So let's go to -- when you heard</p> <p>15 that Raheem was going to pay for your flight, was he</p> <p>16 going to pay for it out of MEF money or out of his</p> <p>17 own personal funds?</p> <p>18 A. Personal funds.</p> <p>19 Q. Okay. How did you know that?</p> <p>20 A. Because that's what I was told.</p> <p>21 Q. So Raheem's going to give you -- what,</p> <p>22 would be a gift to you to pay for your flight -- your</p> <p>23 flight to go to the UK for the weekend?</p> <p>24 A. Yeah, he wanted me to go.</p> <p>25 Q. Why would he want you to go?</p>



<p>Page 232</p> <p>1 A. Because he was going to be there.</p> <p>2 Q. He was interested in some kind of</p> <p>3 relationship with you at the time?</p> <p>4 A. We were just friends, but he just -- he</p> <p>5 was in England and he wanted to hang out, me to be a</p> <p>6 part of the three of us hanging out together.</p> <p>7 Q. Okay. So he was actually in -- I'm</p> <p>8 sorry, was he actually -- was he an employee of MEF</p> <p>9 or was he hooked up with the Robinson campaign?</p> <p>10 A. He's in the same line of business, but</p> <p>11 he wasn't participating in the rally with us, he</p> <p>12 wasn't being paid by MEF for that, he wasn't -- he</p> <p>13 was a fellow at one point, I don't remember if he was</p> <p>14 a fellow during this time or not.</p> <p>15 Q. Okay. When did you -- did you ever</p> <p>16 meet him in person?</p> <p>17 A. Did I ever what?</p> <p>18 Q. Did you ever meet him in person?</p> <p>19 Raheem.</p> <p>20 A. Yeah, I had met him before --</p> <p>21 Q. Where?</p> <p>22 A. -- this.</p> <p>23 Q. I'm sorry, where -- go ahead.</p> <p>24 A. I met him for the first time at the</p> <p>25 dinner we held in AIPAC.</p>	<p>Page 234</p> <p>1 Q. Well, it says here: Raheem is booking</p> <p>2 the room. I told him to save money you and I could</p> <p>3 share a room but three is better.</p> <p>4 So were the three of you going to share</p> <p>5 a room?</p> <p>6 A. I don't think that -- I'm not -- I</p> <p>7 don't think that's what she meant there.</p> <p>8 Q. Did Marnie go on the trip as well?</p> <p>9 A. No, Marnie wasn't there.</p> <p>10 Q. Okay. It says here: I knew Marnie was</p> <p>11 going to end up coming up to New York on Thursday, I</p> <p>12 was waiting for that too.</p> <p>13 What was happening in New York? Is</p> <p>14 that where the board of governors meeting was or was</p> <p>15 that a different meeting?</p> <p>16 A. Different meeting. The board of</p> <p>17 governors meeting would have already happened.</p> <p>18 MR. GOLD: Let's go to Exhibit 19.</p> <p>19 Stop.</p> <p>20 BY MR. GOLD:</p> <p>21 Q. She says to you: I'm going to drop</p> <p>22 kick Marnie.</p> <p>23 And you said: That's me today. What</p> <p>24 is she doing now.</p> <p>25 She says: I'll call you when I leave.</p>
<p>Page 233</p> <p>1 Q. Okay.</p> <p>2 A. And then I'm not sure if we saw each</p> <p>3 other in person again before this rally, but we've</p> <p>4 definitely been at other work events together, ones</p> <p>5 that he's attended in the same line of work.</p> <p>6 Q. So how many times had you been in his</p> <p>7 presence --</p> <p>8 A. I don't know, only a handful.</p> <p>9 Q. Okay. But I guess he -- Lisa told you</p> <p>10 that he was willing to pay for your trip to UK. Did</p> <p>11 she ever explain why?</p> <p>12 A. Just that he wanted me to be there to</p> <p>13 participate in it all as well.</p> <p>14 Q. In the rally?</p> <p>15 A. In the trip. We were going to go to</p> <p>16 the rally and also sightsee with him and just hang</p> <p>17 out for two days.</p> <p>18 Q. Okay. So you don't know whether he had</p> <p>19 any interest in you from a more -- like beyond</p> <p>20 business, on a social level. You don't know that.</p> <p>21 A. Nothing ever happened with me and</p> <p>22 Raheem, so I don't --</p> <p>23 Q. Okay.</p> <p>24 A. -- I don't -- I can't speak to his</p> <p>25 intentions.</p>	<p>Page 235</p> <p>1 What a fucking cunt.</p> <p>2 Is this the kind of language that Lisa</p> <p>3 used at work?</p> <p>4 A. Well, she was just speaking to me</p> <p>5 personally in this.</p> <p>6 Q. Well, I mean have you ever heard her</p> <p>7 refer to any other women as cunts or is this --</p> <p>8 Marnie is the only person she referred to as a cunt?</p> <p>9 A. I don't remember.</p> <p>10 Q. How often did she use the C word with</p> <p>11 you?</p> <p>12 A. I don't think often.</p> <p>13 Q. Okay. And that's how she was referring</p> <p>14 to her -- to Marnie O'Brien, correct?</p> <p>15 A. In that text message, correct.</p> <p>16 Q. Yeah. Okay.</p> <p>17 MR. GOLD: Why don't we take a</p> <p>18 five-minute break right here and I'll be</p> <p>19 back. All right?</p> <p>20 MR. CARSON: Okay.</p> <p>21 MR. GOLD: Off record.</p> <p>22 THE VIDEO SPECIALIST: Off the</p> <p>23 record.</p> <p>24 (A brief recess was taken from</p> <p>25 3:27 p.m. to 3:35 p.m.)</p>

<p>Page 236</p> <p>1 MR. GOLD: I'm posting --</p> <p>2 THE VIDEO SPECIALIST: Back on the</p> <p>3 record.</p> <p>4 MR. GOLD: I haven't marked this</p> <p>5 as an exhibit. We'll mark this, though,</p> <p>6 as Exhibit 66 when we're done the</p> <p>7 deposition.</p> <p>8 BY MR. GOLD:</p> <p>9 Q. This appears to be a text message -- a</p> <p>10 text message with -- can't tell if it's -- looks like</p> <p>11 it's Raheem. I can't tell who it's with. Oh, there</p> <p>12 we go. It's with you, it's Raheem and yourself,</p> <p>13 Ms. McNulty. Do you recall seeing this text message?</p> <p>14 MR. MAINEN: Hey, Sid, sorry to</p> <p>15 interrupt. This is something -- this is</p> <p>16 between Raheem and Lisa, screen shot</p> <p>17 sent to Tricia.</p> <p>18 MR. GOLD: Okay. Good. Got it.</p> <p>19 Thank you.</p> <p>20 BY MR. GOLD:</p> <p>21 Q. I'm sorry. These are screen shots of</p> <p>22 text messages between Raheem and Lisa. Have you ever</p> <p>23 seen this before?</p> <p>24 THE COURT REPORTER: Excuse me --</p> <p>25 MR. GOLD: I think she's --</p>	<p>Page 238</p> <p>1 A. She had told me that he was using</p> <p>2 personal money.</p> <p>3 Q. Okay. And that's what she was led to</p> <p>4 believe?</p> <p>5 A. As far as I know.</p> <p>6 Q. Okay.</p> <p>7 MR. CARSON: Objection. Object to</p> <p>8 form.</p> <p>9 BY MR. GOLD:</p> <p>10 Q. And at no time did you learn that that</p> <p>11 offer to pay for your trip was going to be coming out</p> <p>12 of the monies that MEF had paid Raheem in connection</p> <p>13 with this trip --</p> <p>14 MR. CARSON: Objection. There is</p> <p>15 no evidence that any of this even</p> <p>16 happened, so just --</p> <p>17 MR. GOLD: Well, you can object --</p> <p>18 you can object and --</p> <p>19 MR. CARSON: Hypothetical --</p> <p>20 MR. GOLD: Yeah. No, not</p> <p>21 hypothetical; it's a fact, but I don't</p> <p>22 know if she knew about it, I was only</p> <p>23 asking if she knew about it.</p> <p>24 MR. CARSON: In order for it to be</p> <p>25 a fact, you got to present evidence.</p>
<p>Page 237</p> <p>1 THE COURT REPORTER: Yeah, she's</p> <p>2 muted.</p> <p>3 THE WITNESS: Sorry.</p> <p>4 I don't remember.</p> <p>5 BY MR. GOLD:</p> <p>6 Q. Okay. Anyway, it goes -- it goes to</p> <p>7 the trip to -- it deals with the trip to the UK.</p> <p>8 Were you aware that MEF had paid Raheem \$5,000 in</p> <p>9 connection with this UK trip in May of 2018?</p> <p>10 A. No, I wasn't.</p> <p>11 Q. Or June of 2018?</p> <p>12 A. No.</p> <p>13 Q. Okay. Do you know whether Lisa was</p> <p>14 aware that MEF had paid Raheem \$5,000 in connection</p> <p>15 with the trip to the UK in June of 2018?</p> <p>16 A. I'm not sure. As far as I'm aware, he</p> <p>17 didn't receive money for --</p> <p>18 Q. Well, when you --</p> <p>19 A. -- for the rally anyway. I don't know</p> <p>20 if this is something separate.</p> <p>21 Q. So when Lisa told you that Raheem was</p> <p>22 going to pay for your trip, you don't have any</p> <p>23 recollection as to whether Lisa told you that Raheem</p> <p>24 was using MEF money anyway to pay for your trip, you</p> <p>25 don't have any recollection of that?</p>	<p>Page 239</p> <p>1 All you have is the premise of a</p> <p>2 question --</p> <p>3 THE COURT REPORTER: I'm sorry, I</p> <p>4 can't -- Mr. Carson, I'm having trouble</p> <p>5 hearing anything you're saying there.</p> <p>6 MR. CARSON: Sorry. Well --</p> <p>7 MR. GOLD: And I think you've</p> <p>8 answered the question -- she's answered</p> <p>9 the question already.</p> <p>10 MR. CARSON: Sid, this is a</p> <p>11 hypothetical. She didn't answer the</p> <p>12 question yet. And if she did, it's</p> <p>13 subject to the objection I'm putting on</p> <p>14 the record right now. It's a</p> <p>15 hypothetical, it's assuming facts not in</p> <p>16 evidence, there's no foundation, there</p> <p>17 is no evidence for the premise of the</p> <p>18 question. So subject to all that, she</p> <p>19 can answer.</p> <p>20 MR. GOLD: Okay.</p> <p>21 BY MR. GOLD:</p> <p>22 Q. Again, you were never aware of the fact</p> <p>23 that MEF had paid Raheem \$5,000 in connection with</p> <p>24 this rally in the UK.</p> <p>25 A. Yeah, as far as I know he didn't</p>

<p>1 receive any money --</p> <p>2 MR. CARSON: Same objection.</p> <p>3 THE WITNESS: -- for that rally.</p> <p>4 MR. GOLD: Okay. Let's go back --</p> <p>5 let's put up -- take this off the board,</p> <p>6 and we can go right to Exhibit 19.</p> <p>7 Stop, go back. Go back to the</p> <p>8 highlighted part.</p> <p>9 BY MR. GOLD:</p> <p>10 Q. It says: Raheem is booking the room --</p> <p>11 We covered that already.</p> <p>12 MR. GOLD: Keep going. Scroll</p> <p>13 down. Keep going. Keep going, we</p> <p>14 covered all this. Stop there.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. After she -- Lisa says that Gregg just</p> <p>17 called me and he spoke to DP and they're giving us</p> <p>18 each 300 towards our ticket, and then Lisa says: I</p> <p>19 should tell Raheem.</p> <p>20 You say: Oh my gosh that's amazing.</p> <p>21 Or my \$300 goes to Vasili? That's -- since that's</p> <p>22 what Raheem had kind of agreed to in the beginning.</p> <p>23 What is that about?</p> <p>24 A. Because Vasili was paying for half of</p> <p>25 Lisa's ticket, so they were -- we were discussing</p>	<p>Page 240</p> <p>1 A. I don't know where it went in the end,</p> <p>2 but that's what we were talking about, whether Raheem</p> <p>3 would want it to go to him or not.</p> <p>4 Q. Why wouldn't you just let MEF keep that</p> <p>5 300, though, and you go for free and then Vasili pays</p> <p>6 300 -- the other -- the 300 goes to Lisa's ticket?</p> <p>7 A. Because I was working now with the \$300</p> <p>8 rather than not working.</p> <p>9 Q. But you never got the \$300.</p> <p>10 A. No, it went towards -- because I wasn't</p> <p>11 paying for my ticket.</p> <p>12 Q. Right --</p> <p>13 A. Somebody else was.</p> <p>14 Q. -- so -- but the instructions were that</p> <p>15 -- that -- according to -- he spoke to Daniel Pipes</p> <p>16 and he said that they're giving each of us 300, so if</p> <p>17 you don't need the 300, why would you take the 300</p> <p>18 and give it to Vasili?</p> <p>19 A. Because I was working now. When you</p> <p>20 work you get paid for it.</p> <p>21 Q. So -- who cares?</p> <p>22 A. People who work care. People who have</p> <p>23 bills care.</p> <p>24 Q. Then why didn't you --</p> <p>25 A. It wasn't like a money free-for-all.</p> <p>Page 242</p>
<p>Page 241</p> <p>1 whether she should -- when she talks to Raheem</p> <p>2 whether they should talk about him -- because he was</p> <p>3 paying my full ticket at this point, so whether that</p> <p>4 300 would just go to reimburse him for the portion</p> <p>5 that he paid or if he wanted Vasili to get it since</p> <p>6 he was fine with paying my full portion and Lisa and</p> <p>7 Vasili paying theirs.</p> <p>8 Q. Okay. So Raheem paid for your full</p> <p>9 ticket anyway, correct?</p> <p>10 A. I -- this is the last we talked about</p> <p>11 it. I'm not sure if that money went to Raheem or if</p> <p>12 it went to Vasili or --</p> <p>13 Q. Why didn't you just tell Gregg I don't</p> <p>14 need the 300 because Raheem is paying for my ticket?</p> <p>15 A. Because they wanted us to report back,</p> <p>16 it was -- they would pay 300 towards our ticket and</p> <p>17 the trip would be somewhat work related during the</p> <p>18 rally.</p> <p>19 Q. Yeah, but if Raheem was going to pay</p> <p>20 for your ticket, what's the difference? Why should</p> <p>21 MEF pay for it?</p> <p>22 A. Because I wasn't doing work previously</p> <p>23 when Raheem was paying for it.</p> <p>24 Q. Well, then -- but why would that 300</p> <p>25 then go to Vasili?</p>	<p>Page 243</p> <p>1 Q. Then why didn't you just tell Raheem</p> <p>2 you only need to pay for my ticket over and above</p> <p>3 \$300?</p> <p>4 A. They did have that --</p> <p>5 MR. CARSON: Can you guys hear me?</p> <p>6 THE WITNESS: Now we can.</p> <p>7 MR. CARSON: Because I'm objecting</p> <p>8 --</p> <p>9 THE COURT REPORTER: Barely.</p> <p>10 MR. CARSON: This entire line of</p> <p>11 questioning is based on something that</p> <p>12 didn't happen, right? So --</p> <p>13 MR. GOLD: No, it did happen.</p> <p>14 MR. CARSON: So start with --</p> <p>15 MR. GOLD: It did happen.</p> <p>16 MR. CARSON: No, it didn't.</p> <p>17 MR. GOLD: Vasili paid for her</p> <p>18 ticket. I mean Raheem paid for her</p> <p>19 ticket.</p> <p>20 MR. CARSON: You have no idea</p> <p>21 whether Raheem paid for the ticket with</p> <p>22 MEF money or his own money.</p> <p>23 MR. GOLD: She just said that she</p> <p>24 --</p> <p>25 MR. CARSON: You're making stuff</p>

<p>1 up.</p> <p>2 MR. GOLD: I'm not -- forget about</p> <p>3 the MEF money. My question was --</p> <p>4 MR. CARSON: You're just making</p> <p>5 stuff up for fun. Let's just -- while</p> <p>6 we're at it, let's just invent facts and</p> <p>7 just say Gregg Roman is not a sexual --</p> <p>8 MR. GOLD: It doesn't matter --</p> <p>9 THE COURT REPORTER: Excuse me.</p> <p>10 MR. GOLD: Forget whether Raheem</p> <p>11 did it with MEF money.</p> <p>12 THE COURT REPORTER: Excuse me. I</p> <p>13 can't --</p> <p>14 MR. GOLD: My question is --</p> <p>15 THE COURT REPORTER: I can't hear</p> <p>16 you guys. It's not making it onto the</p> <p>17 record because I can't understand what</p> <p>18 you're saying.</p> <p>19 MR. GOLD: Let me just clarify my</p> <p>20 point. My point is forget about whether</p> <p>21 MEF gave Raheem the money. Raheem did,</p> <p>22 in fact, pay for Tricia's ticket to the</p> <p>23 UK, that's correct.</p> <p>24 MR. CARSON: First of all, I don't</p> <p>25 know if that happened either. Did</p>	<p>Page 244</p> <p>1 Q. Then tell me what you said. Tell me</p> <p>2 what you said.</p> <p>3 MR. CARSON: That's not accurate.</p> <p>4 That's not accurate.</p> <p>5 BY MR. GOLD:</p> <p>6 Q. Tell me what is accurate, ma'am. Tell</p> <p>7 me what is accurate, ma'am.</p> <p>8 MR. CARSON: By the way, the only</p> <p>9 -- the only people making these</p> <p>10 allegations a year and a half later</p> <p>11 after they've been accused of sexual</p> <p>12 harassment, sexual assault --</p> <p>13 MR. GOLD: That's a beautiful,</p> <p>14 beautiful speaking objection.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. Go ahead. Go ahead. Tell me what</p> <p>17 happened --</p> <p>18 MR. CARSON: What happened is what</p> <p>19 my client already testified to.</p> <p>20 MR. GOLD: That she got a free</p> <p>21 trip from Raheem --</p> <p>22 MR. CARSON: (Indiscernible) half</p> <p>23 the tickets and did pay for half --</p> <p>24 MR. GOLD: Let me -- I have one</p> <p>25 question.</p>
<p>Page 245</p> <p>1 Tricia say that?</p> <p>2 MR. GOLD: Well, she just answered</p> <p>3 that she -- no, she already answered</p> <p>4 that he did.</p> <p>5 THE VIDEO SPECIALIST: Excuse me,</p> <p>6 gentlemen. For the sake of the court</p> <p>7 reporter we have to have one person talk</p> <p>8 at once because she cannot do her job</p> <p>9 otherwise. Thank you.</p> <p>10 MR. CARSON: If Mr. Kassam paid</p> <p>11 for anything, then -- it has nothing to</p> <p>12 do with the fact that MEF still paid for</p> <p>13 half of each of their ticket, which is</p> <p>14 \$300, so --</p> <p>15 MR. GOLD: You're missing the</p> <p>16 point -- you're missing the point.</p> <p>17 MR. CARSON: I don't think I am.</p> <p>18 MR. GOLD: The \$300 was supposed</p> <p>19 to go towards Tricia's ticket. Okay?</p> <p>20 It did not go to Tricia's ticket. In</p> <p>21 fact, Lisa used that money to reimburse</p> <p>22 her husband.</p> <p>23 THE WITNESS: That's not -- no one</p> <p>24 ever said that. That's not a fact.</p> <p>25 BY MR. GOLD:</p>	<p>Page 247</p> <p>1 THE COURT REPORTER: I can't hear</p> <p>2 Mr. Carson. I can't hear Mr. Carson.</p> <p>3 MR. GOLD: I have one question.</p> <p>4 BY MR. GOLD:</p> <p>5 Q. Who paid for your trip to the UK?</p> <p>6 A. I'm actually going to get a chance to</p> <p>7 answer now?</p> <p>8 Q. Yeah, you are.</p> <p>9 MR. CARSON: You can answer that</p> <p>10 question. Yeah.</p> <p>11 THE WITNESS: Raheem initially</p> <p>12 paid for my trip. MEF reimbursed \$300,</p> <p>13 which I sent to Lisa to either send to</p> <p>14 Raheem or she was having a conversation</p> <p>15 with Raheem on whether he wanted to</p> <p>16 reimburse Vasili.</p> <p>17 BY MR. GOLD:</p> <p>18 Q. Okay. That's exactly what I said.</p> <p>19 MR. GOLD: Okay. So let's go now</p> <p>20 to the next exhibit.</p> <p>21 MR. CARSON: MEF doesn't get out</p> <p>22 of paying for half of the ticket just</p> <p>23 because --</p> <p>24 MR. GOLD: Save it for the --</p> <p>25 MR. CARSON: -- someone else --</p>



<p>Page 248</p> <p>1 MR. GOLD: Save it for the jury, 2 my friend. 3 MR. CARSON: Yeah. All right. I 4 will. We will save it for the jury. 5 MR. GOLD: Next exhibit is -- 6 we're up to now looks like 19. Is that 7 -- or was that -- we're up to 20 now? 8 MR. MAINEN: We just wrapped up 9 19. We're on 20. 10 MR. GOLD: Okay. All right. 11 Let's get to Exhibit 20. 12 BY MR. GOLD: 13 Q. And I guess these are a series of text 14 messages between yourself and Lisa. The time period 15 now is November 3rd, 2018, and this is at or about 16 the time you met with Mr. Pipes, correct? 17 A. Correct. 18 Q. Okay. And -- 19 MR. GOLD: Scroll down. 20 BY MR. GOLD: 21 Q. Okay. Looks like "I just went from I'm 22 going to enjoy that weekend" -- 23 MR. GOLD: Go ahead. Let her read 24 -- don't go so fast because she has to 25 read it.</p>	<p>Page 250</p> <p>1 a complaint? 2 A. No -- 3 Q. Okay. 4 A. -- not by Daniel. 5 Q. Okay. So at this point we're talking 6 now -- you were talking with Daniel, and Daniel 7 wanted to know exactly what you were complaining 8 about, and did you make your complaints known to 9 Mr. Pipes at that point? 10 A. At what point? 11 Q. November 2018. 12 A. Yes. 13 Q. Okay. And as a result thereof what 14 happened? 15 A. Initially when we talked about it 16 before the weekend started Daniel told us that 17 nothing would happen, that Gregg would get a slap on 18 the wrist and told not to do it again and there would 19 be no changes. And then we got an e-mail that 20 weekend or that night, whenever, that said that now 21 we needed to not come in the office the next day and 22 he wanted to think about it some more and we would 23 have a meeting with everybody together that Monday. 24 Q. Okay. And did that happen? 25 A. Yes.</p>
<p>Page 249</p> <p>1 BY MR. GOLD: 2 Q. She talks about this Young Republican 3 party, and who says "you wanna go"? Is that you? 4 A. No, I think that's her. 5 Q. That's her. 6 "Wanna go, if we still have jobs?" 7 And you said: Haha, if we still have 8 jobs then yes. I was going to wear a gown. How much 9 is it? 10 Was there some concern that you and 11 Lisa had that you were going to lose your jobs 12 because you were going to have this meeting with 13 Daniel Pipes on the 3rd after you had registered your 14 complaints on that -- on the 30th? 15 A. There was always reservations that at 16 any second we could lose our job because Gregg didn't 17 want us there anymore. 18 Q. Was there -- did Daniel Pipes ever 19 threaten you with losing your job when he met with 20 you on the 30th? 21 A. On the 30th? 22 Q. Or November 1st -- whenever it is you 23 registered the complaints, the actual day, were you 24 ever threatened by Daniel Pipes that you would lose 25 your job because you came forward and you registered</p>	<p>Page 251</p> <p>1 Q. Okay. So these -- this e-mail exchange 2 is in anticipation of that meeting, I take it? 3 A. I believe so. 4 Q. Okay. And what happened at the meeting 5 on that Monday? 6 A. The meeting on Monday was very 7 different than the meeting the week before, in some 8 ways. We last left it off with Daniel saying that 9 priests had committed worse crimes and had less 10 punishment and that's why he wasn't going to punish 11 Gregg, and then this Monday we came in and he said 12 that after reconsidering that he would remove Gregg 13 from the office but that nothing else would change 14 with his role, he would still remain the director and 15 still have the senior position and Daniel would take 16 more participation with the office. 17 Q. Okay. And then did -- do you recall 18 Mr. Pipes' office actually posing three questions to 19 you, whether you were satisfied with the resolution 20 or his proposed resolution of the matter? 21 A. He did send an e-mail with those 22 questions, yes. 23 Q. And did you indicate that you were 24 satisfied? 25 A. As long as Gregg wasn't back in the</p>



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<p>1 office, I did say yes. It was better than the week 2 before where nothing was happening to him at all. 3 Q. So after that date did Gregg set foot 4 in the office ever again? 5 A. After that date, yes. 6 Q. And that would be sometime in March of 7 2019? 8 A. Yes. 9 Q. Okay. And did you have any interaction 10 with Gregg from November through March of 2019? 11 A. Yes. 12 Q. Okay. All of it being work related, I 13 take it? 14 A. Yes. 15 Q. Okay. 16 MR. GOLD: Let's go to Exhibit 21. 17 Let's go -- go backwards for one second. 18 BY MR. GOLD: 19 Q. It looks like, again: If we still have 20 jobs do you think we'll be able to work from home? 21 It's midweek. 22 "It's Tuesday I'll take off. Fuck it. 23 You will still have a job. Nothing is going to 24 change for you." 25 Are you now talking to Lisa?</p>	<p>1 A. Yes. 2 Q. Okay. Do you know whether Lisa signed 3 it? 4 A. I'm not sure. I don't think she did. 5 Q. Did anyone sign it? 6 A. I know Matt signed it. 7 Q. How do you know that? 8 A. Because he told me. 9 Q. Okay. 10 MR. GOLD: Stop there. 11 BY MR. GOLD: 12 Q. Yeah, it said: Matt said just sign it. 13 Don't be stupid they are doing this for Gregg. I 14 just talked to Marnie. She's not signing it either. 15 My dad said under no circumstances should I sign 16 it -- 17 Who is that? Is that Lisa talking? 18 A. Yes. 19 Q. Okay. 20 MR. GOLD: Scroll down. Stop. 21 BY MR. GOLD: 22 Q. "Delaney doesn't want to sign it." 23 How was this NDA different than the one 24 you signed when you were first employed at MEF? 25 A. I don't remember the exact specifics of</p>
Page 253	Page 255
<p>1 A. I'm the blue, yeah, and Lisa is -- 2 Q. Okay. And she tells you that you'll 3 still have your job, nothing is going to change for 4 you. 5 MR. GOLD: Go ahead, keep going, 6 scroll -- scroll down. Stop. Okay. 7 We're now to Exhibit 21. 8 BY MR. GOLD: 9 Q. This has to do with the NDA that you 10 were asked to sign, and I know you had some 11 reluctance or apprehension about not signing it. Was 12 the NDA ever -- the NDA that you were asked to sign 13 ever modified or amended? 14 A. There was an amended version sent -- we 15 signed an NDA when we started at MEF -- 16 Q. Okay. 17 A. -- and when the complaints were brought 18 against Gregg they amended the NDA and asked us to 19 sign a new one. 20 Q. And did you sign a new one? 21 A. No. 22 Q. Okay. So you weren't -- you weren't 23 fired for not signing it obviously, right? 24 A. No. 25 Q. Okay. But it was amended?</p>	<p>1 what it said. I know we've given a copy of the 2 document, but I don't remember the exact specifics. 3 Q. Okay. In any event, you didn't -- even 4 with the amendment you wouldn't sign it. 5 MR. GOLD: And keep going down. 6 Scroll down. Stop. 7 BY MR. GOLD: 8 Q. Daniel writes back: As long as you 9 have previously signed an NDA with the Forum, signing 10 the new by tomorrow morning is not imperative. It is 11 largely intended to make everyone in the room -- make 12 sure that everyone in the room has signed a version 13 of the NDA form. The NDA benefits you by allowing 14 you to have access to information necessary for you 15 to do your job at the Forum. As to potentially 16 releasing confidential information to outside 17 counsel, this would be implicitly allowed in the NDA. 18 However, to make you feel more at ease, I've reviewed 19 the NDA to make this explicit. Please note the 20 addition of Section 4. 21 And -- 22 MR. GOLD: Scroll down. Stop. 23 BY MR. GOLD: 24 Q. And Lisa says: Oh gosh, that makes me 25 feel better. I feel like I could cry tonight a</p>

<p>Page 256</p> <p>1 little bit from anxiety relief.</p> <p>2 Was Lisa's reluctance to sign the NDA</p> <p>3 because she understood that if she signed that she</p> <p>4 couldn't talk to an attorney about whatever was going</p> <p>5 on with her?</p> <p>6 A. I'm not sure.</p> <p>7 Q. Okay. Was that why you wouldn't sign</p> <p>8 it?</p> <p>9 A. I didn't want to sign it because there</p> <p>10 should be no reason for an -- we had already signed</p> <p>11 NDAs, so for them to change it specifically to cover</p> <p>12 what was happening with Gregg at that point just</p> <p>13 didn't seem right to me.</p> <p>14 Q. Okay. And you wrote -- you said: If</p> <p>15 you give me your Gmail or whatever I'll forward it to</p> <p>16 you.</p> <p>17 She gives you her Gmail address.</p> <p>18 A. That's me and her.</p> <p>19 Q. Okay. So she forwards it to you; is</p> <p>20 that right?</p> <p>21 A. Correct.</p> <p>22 Q. You then -- and who says "I'm relieved"</p> <p>23 -- I'm sorry, is that Lisa or is that you?</p> <p>24 A. She's the gray.</p> <p>25 Q. Okay. She's the gray? I'm sorry.</p>	<p>Page 258</p> <p>1 draining and that's what you're left with --</p> <p>2 A. I'm the blue.</p> <p>3 Q. You're the blue. This is you saying</p> <p>4 that I think it's all draining and that's what you're</p> <p>5 left with, but I think it's going to only go up from</p> <p>6 here. You're gonna get a fancy title you're proud</p> <p>7 of, you'll be immersed in content, sure not in the</p> <p>8 way you wanted -- want yet, but this is a good</p> <p>9 stepping stone to that.</p> <p>10 So it appears that you're giving her</p> <p>11 words of encouragement and that in a way her job</p> <p>12 becomes a bit more attractive; would you agree?</p> <p>13 A. I was trying to give her a pep talk,</p> <p>14 yes.</p> <p>15 Q. Yeah. Okay.</p> <p>16 MR. GOLD: Keep going down.</p> <p>17 Scroll down. Stop.</p> <p>18 BY MR. GOLD:</p> <p>19 Q. And then you posted: Life is amazing.</p> <p>20 Is that your post?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And then you say: FYI, Matt</p> <p>23 still has not replaced that gift from Neal that he so</p> <p>24 awkwardly asked me to give him. And I've mentioned</p> <p>25 it to him like 15 times by now.</p>
<p>Page 257</p> <p>1 "So I'm glad I wrote the e-mail last</p> <p>2 night. I was freaking out."</p> <p>3 MR. GOLD: Keep going. Scroll</p> <p>4 down. Okay. We're now on Exhibit 22.</p> <p>5 BY MR. GOLD:</p> <p>6 Q. So as far as you know, nobody signed</p> <p>7 the NDA except for maybe Matt?</p> <p>8 A. As far as I know.</p> <p>9 Q. Okay.</p> <p>10 MR. CARSON: For the record,</p> <p>11 Delaney and Caitriona signed it too.</p> <p>12 THE WITNESS: I didn't know.</p> <p>13 MR. GOLD: Okay. So -- keep</p> <p>14 going.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. Is that the picture from the rally, by</p> <p>17 the way, in the UK?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And that was posted by -- is</p> <p>20 that -- now, is that posted by Lisa or you?</p> <p>21 A. Lisa.</p> <p>22 Q. Okay. And then she writes: I'm so</p> <p>23 sad. I don't know.</p> <p>24 And you write: Why?</p> <p>25 And then she says: I think it's all</p>	<p>Page 259</p> <p>1 What exactly is that about?</p> <p>2 A. I don't remember exactly what it was.</p> <p>3 I think that's when Matt had asked me for, like, CBD</p> <p>4 oil that my now-fiance, boyfriend, had given me when</p> <p>5 we first met to try.</p> <p>6 Q. Okay. What exactly is CBD oil?</p> <p>7 A. It's just like a natural -- like a</p> <p>8 vape.</p> <p>9 Q. You would smoke it?</p> <p>10 A. Yeah, you smoke it.</p> <p>11 Q. You can get high from that?</p> <p>12 A. You don't get high. It's not a drug.</p> <p>13 Q. What is it?</p> <p>14 A. I wouldn't be able to say exactly what</p> <p>15 it is. I'm not --</p> <p>16 Q. Do you hyperventilate when --</p> <p>17 A. -- well-versed in it.</p> <p>18 Q. Do you hyperventilate when you smoke</p> <p>19 it?</p> <p>20 A. I don't smoke it.</p> <p>21 Q. Oh, so why would your boyfriend -- why</p> <p>22 would -- why would you have it?</p> <p>23 A. It was given as a gift.</p> <p>24 Q. Oh, okay. Okay. And then she writes</p> <p>25 back: I don't know what to say. Unbelievable.</p>

<p style="text-align: right;">Page 260</p> <p>1 You say: So weird. I wish I had never</p> <p>2 given it to him. The lack of respect to not replace</p> <p>3 it for weeks is making me mad.</p> <p>4 So this is something you gave to Matt</p> <p>5 that you had gotten from Neal?</p> <p>6 A. Correct.</p> <p>7 Q. Okay. So why were you asking him to</p> <p>8 give it back to you?</p> <p>9 A. Because it was a gift. It was</p> <p>10 sentimental to me.</p> <p>11 Q. Okay. Okay. So when you gave it to</p> <p>12 Matt, it wasn't intended as a gift, I take it, he was</p> <p>13 going to borrow it?</p> <p>14 A. Yeah, Matt had asked me to take it and</p> <p>15 said he would replace it.</p> <p>16 Q. Oh, okay. So he -- you expected him to</p> <p>17 buy a new one for you.</p> <p>18 A. Correct.</p> <p>19 Q. What's the cost of that?</p> <p>20 A. I have no idea.</p> <p>21 Q. Okay.</p> <p>22 MR. GOLD: Scroll down. Stop.</p> <p>23 BY MR. GOLD:</p> <p>24 Q. You say: We planned it, he came here</p> <p>25 for a day and then we drove to my --</p>	<p style="text-align: right;">Page 262</p> <p>1 And you say: You have an amazing and</p> <p>2 hot husband and super adorable children. Don't sweat</p> <p>3 some short dude who shot you down not texting --</p> <p>4 Who are you referring to? Is this</p> <p>5 Danny Thomas?</p> <p>6 A. I don't remember.</p> <p>7 Q. Okay. But you're trying to kind of</p> <p>8 reassure her that she has family obligations?</p> <p>9 A. I'm reminding her that her life is</p> <p>10 good.</p> <p>11 Q. Okay. And she was trying to cheat on</p> <p>12 her husband, I take it?</p> <p>13 A. I don't -- she wasn't trying to cheat</p> <p>14 on her husband. I think she was -- had a friendly</p> <p>15 relationship with somebody that she's mentioning in</p> <p>16 this text.</p> <p>17 Q. You don't know who that was?</p> <p>18 A. I don't.</p> <p>19 Q. Okay. And --</p> <p>20 MR. GOLD: Scroll down.</p> <p>21 BY MR. GOLD:</p> <p>22 Q. You said: You have a gorgeous family.</p> <p>23 MR. GOLD: Scroll down. Scroll</p> <p>24 down. All right. 24. Keep going.</p> <p>25 BY MR. GOLD:</p>
<p style="text-align: right;">Page 261</p> <p>1 MR. GOLD: Can you scroll down? I</p> <p>2 can't see that word. Okay.</p> <p>3 BY MR. GOLD:</p> <p>4 Q. -- drove to my W his friends who had</p> <p>5 something up here this weekend.</p> <p>6 Who would that be?</p> <p>7 A. I don't know what this conversation</p> <p>8 that -- you're starting, like, in the middle a</p> <p>9 conversation. I don't --</p> <p>10 Q. Okay.</p> <p>11 MR. GOLD: Scroll up for a minute.</p> <p>12 Let's see if we can get the context of</p> <p>13 this. Stop.</p> <p>14 BY MR. GOLD:</p> <p>15 Q. You say: I'm in New York now.</p> <p>16 Does that refresh your recollection?</p> <p>17 A. Okay. So I was visiting him.</p> <p>18 Q. Meaning Neal?</p> <p>19 A. Correct.</p> <p>20 Q. Okay. And Lisa then writes back: I'm</p> <p>21 losing my mind. This has been the worst month. I'm</p> <p>22 irritated that a person I'm not even to be --</p> <p>23 supposed to be talking with hasn't texted or called</p> <p>24 me. Can you please remind me that I have a husband</p> <p>25 and a family and responsibilities.</p>	<p style="text-align: right;">Page 263</p> <p>1 Q. And who is that a picture of?</p> <p>2 A. I think that's Jaz.</p> <p>3 Q. And that's the mother of Danny Thomas's</p> <p>4 children?</p> <p>5 A. I think so.</p> <p>6 Q. Okay.</p> <p>7 MR. GOLD: Go back up. I want to</p> <p>8 see what the date of that previous</p> <p>9 message was. Stop.</p> <p>10 BY MR. GOLD:</p> <p>11 Q. Yeah, it looks like that was on the</p> <p>12 10th of November, so this is now on the 17th of</p> <p>13 November 2018, so does that refresh your recollection</p> <p>14 that she was talking about Danny Thomas in that</p> <p>15 previous text message?</p> <p>16 A. It could have been. I don't remember.</p> <p>17 Q. Do you know why she would post a</p> <p>18 picture of Jaz and her son on this -- in this</p> <p>19 message?</p> <p>20 A. I don't remember.</p> <p>21 MR. GOLD: Scroll down. Stop.</p> <p>22 Scroll down. Scroll down. Stop.</p> <p>23 BY MR. GOLD:</p> <p>24 Q. In the box there is that a text message</p> <p>25 exchange between Danny and Lisa?</p>

<p>Page 264</p> <p>1 A. It looks like it.</p> <p>2 Q. And Danny writes --</p> <p>3 MR. GOLD: Go back up -- can you</p> <p>4 scroll up for a minute? Stop.</p> <p>5 BY MR. GOLD:</p> <p>6 Q. "About to talk on Capitol Hill" --</p> <p>7 A. I can't read that if I'm supposed to</p> <p>8 be.</p> <p>9 Q. Okay. And who is sharif, do you know</p> <p>10 who that is, msharif?</p> <p>11 A. I don't know.</p> <p>12 MR. GOLD: Scroll down. Scroll</p> <p>13 down. Scroll down. Make this larger.</p> <p>14 Okay. Scroll down.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. Okay. And he said: Lisa, all the</p> <p>17 things from today have been deleted. He knows he</p> <p>18 needs to change. I promise you it won't happen</p> <p>19 again. Don't fall out with me FFS. I int done fuck</p> <p>20 all.</p> <p>21 "Right."</p> <p>22 You wouldn't know who those messages</p> <p>23 came from, would you?</p> <p>24 A. Who they came from?</p> <p>25 Q. Yeah, is that the exchange between</p>	<p>Page 266</p> <p>1 BY MR. GOLD:</p> <p>2 Q. And who is that a picture of, by the</p> <p>3 way?</p> <p>4 A. It's a Golden Girl.</p> <p>5 Q. Okay. And then she goes: Lots of</p> <p>6 luck. That's me. Except I'm so miserable. And I</p> <p>7 don't look good -- look that good.</p> <p>8 You say: Crazy.</p> <p>9 "You're coming in tomorrow?"</p> <p>10 She says -- you say yes.</p> <p>11 "I'll be in 9:30ish. I'm taking</p> <p>12 Georgie to school."</p> <p>13 Is Georgie her son or daughter?</p> <p>14 A. Her son.</p> <p>15 Q. Son? Okay. And then you say: I'll be</p> <p>16 in regular time.</p> <p>17 What is regular time, by the way?</p> <p>18 A. For me usually like 8 a.m.</p> <p>19 Q. Okay.</p> <p>20 MR. GOLD: Scroll down.</p> <p>21 BY MR. GOLD:</p> <p>22 Q. She says: Are you reading these</p> <p>23 e-mails?</p> <p>24 And then you say -- she says: Because</p> <p>25 DP and I --</p>
<p>Page 265</p> <p>1 Danny and her?</p> <p>2 A. Yeah, well, I can see it's Danny.</p> <p>3 Q. Okay. And that's her with the "right"?</p> <p>4 A. I think she's the -- yeah, she's the</p> <p>5 green and he's the white.</p> <p>6 Q. Okay.</p> <p>7 MR. GOLD: Scroll down. Stop.</p> <p>8 Okay.</p> <p>9 BY MR. GOLD:</p> <p>10 Q. And then it looks like you say: Are</p> <p>11 you gonna have a conversation about you two.</p> <p>12 She says: I don't know. Should I?</p> <p>13 And you say: I feel like you either</p> <p>14 have to be nice or not have it or just have it, but</p> <p>15 you can't be passive aggressive without talking about</p> <p>16 it.</p> <p>17 Is that your comment?</p> <p>18 A. Yes.</p> <p>19 Q. What did you mean by that?</p> <p>20 A. I'm not sure exactly what it's</p> <p>21 referring to, but I'm just telling her to be</p> <p>22 forthright with Danny about whatever she's upset</p> <p>23 about.</p> <p>24 Q. Okay.</p> <p>25 MR. GOLD: Scroll down.</p>	<p>Page 267</p> <p>1 "Why that face?"</p> <p>2 And she says: Because DP and I</p> <p>3 disagree.</p> <p>4 And it looks like you're giving her</p> <p>5 some advice on how to handle this relationship with</p> <p>6 Danny?</p> <p>7 A. I don't see that.</p> <p>8 Q. Well, it says: You're just discussing</p> <p>9 though, it doesn't need to be an argument or anything</p> <p>10 --</p> <p>11 A. I think that's between her and Daniel.</p> <p>12 Q. Oh, this is now -- okay. So she</p> <p>13 references Daniel -- "I'm basically advising Tommy.</p> <p>14 We had this long talk after we got off the phone and</p> <p>15 he called Danny and makes a quick video. And now DP</p> <p>16 disagrees."</p> <p>17 You're telling her not to argue with</p> <p>18 Daniel Pipes, is that it? Or Daniel -- Danny Thomas?</p> <p>19 Which one?</p> <p>20 A. I was telling her that it didn't --</p> <p>21 what she was describing to me didn't sound like an</p> <p>22 argument, it just sounded like a disagreement.</p> <p>23 Q. Okay.</p> <p>24 MR. GOLD: Scroll down. Let's get</p> <p>25 to the yellow part. Okay.</p>



<p>Page 268</p> <p>1 BY MR. GOLD:</p> <p>2 Q. So she says: I definitely think he is</p> <p>3 wrong. Like playing it safe. Tommy has a larger</p> <p>4 audience now. Going back to grooming gangs is good</p> <p>5 work and he should -- he should but the people want</p> <p>6 more from him. If he throws this Brexit rally and a</p> <p>7 hundred thousand people show up that will make a</p> <p>8 mark.</p> <p>9 And then you say: Yeah, if a hundred</p> <p>10 thousand people show up it definitely would.</p> <p>11 And she says: I don't know what's</p> <p>12 wrong lately but I want to address it at work.</p> <p>13 You've been really funny since DC. You said a</p> <p>14 thousand times have you think -- that you think you</p> <p>15 work so much harder than everyone else. In DC you</p> <p>16 did what you don't understand how the rest of my ear</p> <p>17 looked so that's not a fair comparison you've been a</p> <p>18 little bitchy with me.</p> <p>19 What is she talking about, do you know?</p> <p>20 A. I think I was just upset in general at</p> <p>21 the time. I was super overworked, I was working like</p> <p>22 20-hour days at this point and upset about work in</p> <p>23 general.</p> <p>24 Q. Okay. And it says: I saw you rolling</p> <p>25 your eyes while I was talking today. I know you're</p>	<p>Page 270</p> <p>1 A. Well, I know she separated --</p> <p>2 MR. CARSON: Object --</p> <p>3 THE WITNESS: -- from her husband.</p> <p>4 MR. CARSON: Woah, woah, woah,</p> <p>5 objection. Again, are we making up</p> <p>6 facts that aren't on the record again</p> <p>7 and premising our questions on those</p> <p>8 unsupported facts?</p> <p>9 MR. GOLD: I just asked a</p> <p>10 question.</p> <p>11 MR. CARSON: Yeah, and the</p> <p>12 question was did -- something about</p> <p>13 cheating on husband and cheating on her</p> <p>14 children now too. She never cheated on</p> <p>15 her husband, she never cheated on her</p> <p>16 children, so as long as we understand</p> <p>17 that, then she could answer the</p> <p>18 question.</p> <p>19 MR. GOLD: Okay. That's your</p> <p>20 interpretation. Okay.</p> <p>21 MR. CARSON: That's fact.</p> <p>22 MR. GOLD: Okay. Let's go.</p> <p>23 BY MR. GOLD:</p> <p>24 Q. You said: I just -- I'm just</p> <p>25 overworked, tired, and sick, and it's making me</p>
<p>Page 269</p> <p>1 not happy with my behavior and the Danny thing but</p> <p>2 when friends are weak that's when their friends need</p> <p>3 to be there the most. I don't know what it is --</p> <p>4 what's the core of the problem but I know you are</p> <p>5 hurting my feelings and I don't like it.</p> <p>6 And you then say: Well, I'm just</p> <p>7 overworked, tired, and sick --</p> <p>8 So it seems like she had some</p> <p>9 apprehension or misapprehension that you were not</p> <p>10 happy with her interactions with Danny. Are you</p> <p>11 saying that's not accurate?</p> <p>12 A. No, I think she -- I mean, I didn't</p> <p>13 want to be hearing about every little thing about</p> <p>14 them, I think was -- she thought that it was like a</p> <p>15 bother to me.</p> <p>16 Q. From a morality viewpoint, do you feel</p> <p>17 it was appropriate for her to be, you know, cheating</p> <p>18 on her husband and (indiscernible)?</p> <p>19 THE COURT REPORTER: Mr. Gold, I</p> <p>20 didn't hear the question. Can you --</p> <p>21 MR. GOLD: Yeah.</p> <p>22 THE COURT REPORTER: -- repeat it?</p> <p>23 BY MR. GOLD:</p> <p>24 Q. Do you have a moral issue with the fact</p> <p>25 she was cheating on her husband and her children?</p>	<p>Page 271</p> <p>1 irritable. DC made me annoyed with everyone because</p> <p>2 I was working 20 hours a day. Everyone else was on</p> <p>3 how Caitriona so eloquently put it "vacation." I</p> <p>4 feel like Delaney when she said "Lisa, I'm in a place</p> <p>5 where I can't celebrate every one of your successes</p> <p>6 right now." It's hard to hear "Daniel loves</p> <p>7 everything I write" from you while I'm drowning in</p> <p>8 work and stressed by -- stressed out every second.</p> <p>9 So it appears like you were telling her</p> <p>10 you're exhausted from the amount of work you have,</p> <p>11 correct? And you're a little grumpy.</p> <p>12 MR. CARSON: These are really good</p> <p>13 questions. Object to form.</p> <p>14 BY MR. GOLD:</p> <p>15 Q. Is that true?</p> <p>16 MR. CARSON: Object to form.</p> <p>17 BY MR. GOLD:</p> <p>18 Q. Go ahead. Answer the question.</p> <p>19 MR. CARSON: You want her to tell</p> <p>20 you how it appears? That's your</p> <p>21 question?</p> <p>22 MR. GOLD: Yeah, that's my</p> <p>23 question, yeah.</p> <p>24 MR. CARSON: How does it appear --</p> <p>25 MR. GOLD: You want to ask the</p>



<p>Page 272</p> <p>1 question for me -- you want to ask the</p> <p>2 question for me?</p> <p>3 MR. CARSON: Yeah, I probably --</p> <p>4 MR. GOLD: Go ahead, ask the</p> <p>5 question --</p> <p>6 MR. CARSON: -- could do a better</p> <p>7 job.</p> <p>8 MR. GOLD: You ask the question.</p> <p>9 Go ahead.</p> <p>10 MR. CARSON: Well, I would have to</p> <p>11 see the exhibit. Do you want to read</p> <p>12 the exhibit to me, Mr. Gold?</p> <p>13 MR. GOLD: Well, it's right --</p> <p>14 it's right in front of your face. Put</p> <p>15 your face on the screen.</p> <p>16 MR. CARSON: No, I can't. Not</p> <p>17 possible.</p> <p>18 MR. GOLD: You don't have the</p> <p>19 exhibit on your screen?</p> <p>20 MR. CARSON: Do not.</p> <p>21 MR. GOLD: Okay.</p> <p>22 BY MR. GOLD:</p> <p>23 Q. Let me just finish this last line here.</p> <p>24 You said: I'm grumpy and I miss you as a friend,</p> <p>25 instead of only ever talking about Tommy and Danny</p>	<p>Page 274</p> <p>1 Is she talking with you?</p> <p>2 A. Not about me. This conversation is</p> <p>3 with me.</p> <p>4 Q. Okay. So what does she mean by saying</p> <p>5 that -- is that her saying that your behavior isn't</p> <p>6 professional or is that you telling her that her</p> <p>7 behavior isn't professional?</p> <p>8 A. No, she's saying this about someone</p> <p>9 else.</p> <p>10 Q. Who is she talking about?</p> <p>11 A. I think Jaz from what you scrolled by</p> <p>12 earlier.</p> <p>13 MR. GOLD: Scroll up. Stop. Go</p> <p>14 down. Stop.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. "Matt and DP" -- "Matt, DP, and Marc</p> <p>17 have been in spa -- in the spa office" --</p> <p>18 What's the spa office? What is that?</p> <p>19 A. I think it's an auto correct from "the"</p> <p>20 --</p> <p>21 Q. Okay.</p> <p>22 -- "with the door closed" --</p> <p>23 A. -- or DP's.</p> <p>24 Q. Okay.</p> <p>25 -- "with the door closed for like an</p>
<p>Page 273</p> <p>1 and Avi and Cassandra --</p> <p>2 Who is Avi?</p> <p>3 A. Someone she met --</p> <p>4 Q. Another guy?</p> <p>5 A. -- in London.</p> <p>6 Q. Another male?</p> <p>7 A. Avi is a male. He worked with the</p> <p>8 Tommy stuff too, I think.</p> <p>9 Q. -- and all these shiny people that are</p> <p>10 just so much more interesting. London is better, I</p> <p>11 get it. They are better, I get it. That will never</p> <p>12 be me.</p> <p>13 What do you mean by that, that will</p> <p>14 never be me?</p> <p>15 A. One of these journalists who are</p> <p>16 traveling the world.</p> <p>17 MR. GOLD: Okay. Do you want to</p> <p>18 scroll down to the next exhibit? Keep</p> <p>19 going. Stop. Okay, keep going. Keep</p> <p>20 going. Stop. Keep going. Stop. Okay.</p> <p>21 BY MR. GOLD:</p> <p>22 Q. She says to you: I don't know it was</p> <p>23 like eight hours ago. I told Danny to give her my</p> <p>24 number. I'm gonna look your problem isn't with me,</p> <p>25 your behavior isn't professional.</p>	<p>Page 275</p> <p>1 hour."</p> <p>2 So this is something that was sent to</p> <p>3 you during work on a given day, December 28th, 2018?</p> <p>4 A. I'm the blue.</p> <p>5 Q. Okay. So you sent it to her.</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And this is now at work,</p> <p>8 correct?</p> <p>9 A. I'm not sure.</p> <p>10 Q. Well, 2:43 in the afternoon.</p> <p>11 A. Yeah, I can't see the time.</p> <p>12 Q. Yeah. Okay.</p> <p>13 MR. GOLD: So scroll down. Stop.</p> <p>14 BY MR. GOLD:</p> <p>15 Q. She -- and this is Lisa saying: I</p> <p>16 should read them instead of skimming them. Mental</p> <p>17 note. It's even worse with George on my lap.</p> <p>18 Is that Lisa's response?</p> <p>19 A. To the text message before it, yes.</p> <p>20 Q. Who is George?</p> <p>21 A. Her son.</p> <p>22 Q. Okay. So she's home at the time, I</p> <p>23 take it?</p> <p>24 A. I think so.</p> <p>25 Q. Okay.</p>

<p>Page 276</p> <p>1 MR. GOLD: Keep going down. Stop.</p> <p>2 Keep going down. Stop.</p> <p>3 BY MR. GOLD:</p> <p>4 Q. And I guess it's -- she makes a</p> <p>5 comment: Could you imagine if social media stalked</p> <p>6 all of Vasili's female coworkers.</p> <p>7 What is she referring to there? Do you</p> <p>8 know?</p> <p>9 A. I'm not sure.</p> <p>10 MR. GOLD: Scroll down. Scroll</p> <p>11 down. Keep going. Stop.</p> <p>12 BY MR. GOLD:</p> <p>13 Q. Okay. Now she injects --</p> <p>14 MR. GOLD: Scroll back up for a</p> <p>15 minute. Stop. Scroll down. Stop.</p> <p>16 Scroll down. Stop.</p> <p>17 BY MR. GOLD:</p> <p>18 Q. Okay. Looks -- she says -- again,</p> <p>19 she's in the -- you're in the blue and she's in the</p> <p>20 gray, right?</p> <p>21 A. Correct.</p> <p>22 Q. Okay. She says: LOL. It's Tommy's</p> <p>23 company so I'm betting he doesn't.</p> <p>24 And you say: Haha so funny.</p> <p>25 And then you say: I wonder what Jaz is</p>	<p>Page 278</p> <p>1 Q. Well, what did she tell you?</p> <p>2 A. I know they hung out a few times, they</p> <p>3 saw each other, they talked.</p> <p>4 Q. In the UK or --</p> <p>5 A. I don't know exactly when, but yes.</p> <p>6 Q. Okay. Then you mention: Haha, a new</p> <p>7 dress? I just saw this, did something happen?</p> <p>8 And she says: Nothing happened. Trump</p> <p>9 hotel for NYE in -- New Years Eve in DC with Raheem.</p> <p>10 You in?</p> <p>11 You said: I think I'm too poor for</p> <p>12 that.</p> <p>13 And she mentioned just hang out, no</p> <p>14 ball or nothing.</p> <p>15 MR. GOLD: Keep scrolling down.</p> <p>16 Stop.</p> <p>17 BY MR. GOLD:</p> <p>18 Q. You say: I need to figure out the</p> <p>19 money thing. I don't think Marnie cut my check right</p> <p>20 for the one millionth time.</p> <p>21 Were you having problems getting</p> <p>22 payroll checks or reimbursement checks from Marnie?</p> <p>23 A. They just weren't always accurate.</p> <p>24 Q. Okay.</p> <p>25 MR. GOLD: Keep going. Stop.</p>
<p>Page 277</p> <p>1 thinking now. I can't believe she never called, what</p> <p>2 a bizarro.</p> <p>3 And then she says: I bet she will call</p> <p>4 tomorrow morning.</p> <p>5 Is that -- does that mean she was going</p> <p>6 to call Lisa in the morning?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. So was she having conversations</p> <p>9 with Jaz at or about this time in December of 2018 to</p> <p>10 the best of your knowledge?</p> <p>11 A. I think this was supposed to be the</p> <p>12 first time that Jaz was calling her.</p> <p>13 Q. Okay. And Jaz, again, is the mother of</p> <p>14 the children of Danny Thomas, correct?</p> <p>15 A. Correct.</p> <p>16 Q. Did she tell you why she would be</p> <p>17 calling her?</p> <p>18 A. No.</p> <p>19 MR. GOLD: Okay. Scroll down.</p> <p>20 BY MR. GOLD:</p> <p>21 Q. At this point in time was -- did you</p> <p>22 know whether Lisa was spending more time with Danny</p> <p>23 Thomas?</p> <p>24 A. I don't know if she was spending more</p> <p>25 time.</p>	<p>Page 279</p> <p>1 BY MR. GOLD:</p> <p>2 Q. You say: I hate him so much. I can't</p> <p>3 wait till you're over him, you're passionate about</p> <p>4 somebody else, because it's only when -- only then</p> <p>5 you'll realize what a little twerp he is.</p> <p>6 Are you talking about Danny Thomas now</p> <p>7 and the relationship with -- she had with Danny</p> <p>8 Thomas?</p> <p>9 A. I don't remember. I believe so.</p> <p>10 Q. Who is the little twerp? You don't</p> <p>11 remember?</p> <p>12 A. Probably him.</p> <p>13 Q. Okay. Looks like you're trying to talk</p> <p>14 her out of any further contact with him; would that</p> <p>15 be fair to say?</p> <p>16 A. No, I don't think I was trying to talk</p> <p>17 her out of any contact with him.</p> <p>18 Q. Okay. Okay.</p> <p>19 MR. GOLD: Keep going. Scroll</p> <p>20 down. Stop.</p> <p>21 BY MR. GOLD:</p> <p>22 Q. She says --</p> <p>23 MR. GOLD: Scroll up for a second.</p> <p>24 BY MR. GOLD:</p> <p>25 Q. Something about an 18-month position at</p>

<p style="text-align: right;">Page 280</p> <p>1 the Gates Foundation, the -- you say: That would be 2 nice, are you applying. 3 At that point was Lisa looking for 4 work? 5 A. Not that I know of, but she sent me 6 that job request, or that job opening. 7 Q. Okay. And she writes back: Thinking 8 about it. I don't have enough French. 9 You say: Boo. I'm definitely gonna 10 start looking, fuck this under appreciated bullshit. 11 So that was January 18th, 2019. At 12 that point you stated you were going to start looking 13 for work. Is that what you did? 14 A. No, I was just venting. 15 Q. Okay. 16 MR. GOLD: Scroll down. Scroll 17 down. Stop. Scroll down. Stop. 18 Scroll down. 19 We're going to take a break right 20 now. It's Exhibit 28. Give me a 21 two-minute break. All right? 22 Off the record. 23 THE VIDEO SPECIALIST: Off the 24 record. 25 (A brief recess was taken from</p>	<p style="text-align: right;">Page 282</p> <p>1 MR. GOLD: So go back to the first 2 -- 3 BY MR. GOLD: 4 Q. Okay. So Lisa says: I'm about to say 5 expect those dick pics any day. 6 And you said: You can't do that, he's 7 got pictures of you too. 8 Is the "he" Danny Thomas or her 9 husband? 10 A. Danny. 11 Q. Okay. And why would she tell you that 12 she's about to send some dick pics to Danny Thomas? 13 A. She was upset with him. 14 Q. And is she sending pictures -- and 15 whose dick is she photographing to send to Danny 16 Thomas? 17 A. His. 18 Q. Okay. So I guess in some kind of 19 expression of anger she's going to send him some dick 20 pics of his own dick? 21 A. Yeah, that he had sent to her. 22 Q. That he had sent to her. Okay. So -- 23 and you say: You can't do that, he's got pictures of 24 you too. 25 What pictures did he have of her?</p>
<p style="text-align: right;">Page 281</p> <p>1 4:25 p.m. to 4:32 p.m.) 2 THE VIDEO SPECIALIST: The time is 3 4:32 p.m. We are now back on the 4 record. 5 BY MR. GOLD: 6 Q. Okay. We're on Exhibit 28 and we're 7 trying to focus on the highlighted yellow portions of 8 the text message, and of course if you need to have 9 me scroll back up to get a better feel for the 10 context of any statement that may have been 11 attributed to you or Lisa, please tell me. I'll be 12 going out of my way to kind of scroll back and forth 13 for you, but that rate we'll be here probably 14 forever, so I'm going to try to take it up a notch 15 for you. 16 So, again, you're in the gray and -- 17 rather, Lisa's in the gray and you're in the blue, 18 correct? 19 A. Correct. 20 Q. And we're now up to Exhibit 28, and the 21 date of that -- this text is -- 22 MR. GOLD: Can you scroll -- 23 BY MR. GOLD: 24 Q. -- looks like it's -- okay. We're now 25 on January of 2019.</p>	<p style="text-align: right;">Page 283</p> <p>1 A. I know the two of them sent intimate 2 pictures back and forth to each other when they were 3 in a relationship. 4 Q. Okay. Were you uncomfortable getting 5 these kind of text messages from Lisa? 6 A. Not really. It's not something that I 7 delve too deeply into, but -- 8 Q. Well, do they call -- is this what's 9 known as revenge porn? Ever hear that term before? 10 MR. CARSON: Asking someone a 11 question about a dick pic -- 12 MR. GOLD: Yeah, do you know what 13 revenge porn is. Yeah. 14 THE WITNESS: No. 15 MR. CARSON: Yeah, I'm going to -- 16 BY MR. GOLD: 17 Q. Okay. If you don't know, you don't 18 know. 19 Okay. Then she says: Fuck him. I'm 20 so angry. 21 MR. GOLD: Keep scrolling down. 22 BY MR. GOLD: 23 Q. You say: You have every right to be, 24 he treats you like a joke. He's the joke. 25 And she says: Still active, hasn't</p>

<p style="text-align: right;">Page 284</p> <p>1 read -- hasn't read it's.</p> <p>2 Meaning, what, he hasn't gotten a --</p> <p>3 hasn't gotten the dick pic yet? Is that what she</p> <p>4 means?</p> <p>5 A. No, it means she hasn't -- he hadn't</p> <p>6 read the text message she sent through.</p> <p>7 Q. Okay. And you say: What is he even</p> <p>8 doing?</p> <p>9 And she says: Talking to other chicks</p> <p>10 is the only thing I can think of. He's one point of</p> <p>11 Sapchat --</p> <p>12 What exactly is that, Sapchat, do you</p> <p>13 know?</p> <p>14 A. Snapchat.</p> <p>15 Q. Oh, is that what that -- left out the</p> <p>16 N. Okay.</p> <p>17 -- since last talked to him as he's</p> <p>18 never on it. So I'm fucking done.</p> <p>19 You say: I loathe him. He just chats</p> <p>20 it up with a bunch of randos like the one he DMSs</p> <p>21 kissy faces.</p> <p>22 What's a rando? Random women?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. I'm getting good at this now.</p> <p>25 And you say: He's the worst. Be</p>	<p style="text-align: right;">Page 286</p> <p>1 I guess herself and Danny together.</p> <p>2 A. I don't think she actually did send</p> <p>3 them, she was just fighting with him --</p> <p>4 Q. Well, I mean, it sounds --</p> <p>5 A. -- and saying things --</p> <p>6 Q. It says like she was -- sounds like she</p> <p>7 was threatening him. Anyway --</p> <p>8 MR. CARSON: Is that a question?</p> <p>9 BY MR. GOLD:</p> <p>10 Q. Well, what -- let's assume that they</p> <p>11 were fighting. I mean, do you think that's</p> <p>12 appropriate to be threatening to send his -- the</p> <p>13 mother of his children sexual photos because she's</p> <p>14 angry at him or fighting with him?</p> <p>15 MR. CARSON: Object to form.</p> <p>16 Hypothetical question.</p> <p>17 You can answer.</p> <p>18 BY MR. GOLD:</p> <p>19 Q. You can answer.</p> <p>20 A. I can't speak to what exactly was going</p> <p>21 on in that relationship at the time. I don't know</p> <p>22 all of the details and I don't know exactly what this</p> <p>23 fight entailed. I'm just seeing bits and pieces of</p> <p>24 it. So I really can't answer to --</p> <p>25 Q. She then writes back: You have no --</p>
<p style="text-align: right;">Page 285</p> <p>1 alright, Dean Lewis --</p> <p>2 Who is Dean Lewis?</p> <p>3 A. A singer.</p> <p>4 Q. Okay.</p> <p>5 -- have you heard it?</p> <p>6 MR. GOLD: And then scroll down.</p> <p>7 BY MR. GOLD:</p> <p>8 Q. She writes down --</p> <p>9 MR. GOLD: Stop.</p> <p>10 BY MR. GOLD:</p> <p>11 Q. She says -- this is Danny Thomas, I</p> <p>12 guess it's an exchange she sends to you.</p> <p>13 "Oh my bad."</p> <p>14 And she says: I'm the last person you</p> <p>15 want to make mad hang up on me and I swear to God I'm</p> <p>16 sending Jaz every fucking piece of that shit I have</p> <p>17 from you.</p> <p>18 So now we have Lisa threatening Danny</p> <p>19 to send photographs to Jaz. How did that make you</p> <p>20 feel when you knew she was having that exchange with</p> <p>21 Danny Thomas?</p> <p>22 A. Just fighting with somebody that she's</p> <p>23 intimate with at the time. I didn't think she was --</p> <p>24 Q. You don't see anything wrong with</p> <p>25 somebody sending a -- her sending Jazmin pictures of</p>	<p style="text-align: right;">Page 287</p> <p>1 you have no right to treat me with disrespect like</p> <p>2 after I've done fucking everything for you.</p> <p>3 Do you know what she meant by "I've</p> <p>4 done everything fucking for you"?</p> <p>5 MR. CARSON: Is this a text thread</p> <p>6 between Lisa and Danny Tommo?</p> <p>7 MR. GOLD: Yeah. Yeah.</p> <p>8 BY MR. GOLD:</p> <p>9 Q. Do you know --</p> <p>10 MR. GOLD: I asked what -- do you</p> <p>11 know what she's referring to.</p> <p>12 MR. CARSON: You're asking my</p> <p>13 client her opinion about a communication</p> <p>14 --</p> <p>15 MR. GOLD: No, I'm asking your</p> <p>16 client does she have any idea what she's</p> <p>17 referring to. That's the question. The</p> <p>18 answer is yes or no.</p> <p>19 THE WITNESS: No, I don't know --</p> <p>20 MR. CARSON: Object to form.</p> <p>21 THE WITNESS: -- what "everything"</p> <p>22 is.</p> <p>23 BY MR. GOLD:</p> <p>24 Q. And she says -- he says: Wow, thanks,</p> <p>25 babe.</p>



<p>Page 288</p> <p>1 And she says: Don't fucking babe me. 2 "Your having a go at me for someone 3 taking shit." 4 And she writes back: I'm two seconds 5 away from hitting fucking send you better fix up -- 6 fix pick up -- 7 MR. GOLD: Scroll down. 8 BY MR. GOLD: 9 Q. Anyway, is that her saying "this was 10 after I spoke to him and he hung up on me because I 11 was a dick"? 12 A. Yeah. 13 MR. CARSON: I'm going to object 14 based on the fact that's not her text 15 message -- you're asking her to 16 authenticate -- 17 MR. GOLD: No, she sent this -- 18 this is what -- 19 BY MR. GOLD: 20 Q. Who sent -- is this a text that was 21 sent to you by Lisa? 22 A. Yeah, the gray is Lisa talking to me. 23 Q. Okay. And it's highlighted here in 24 yellow. She says: I just hung up on him because I 25 was a dick.</p>	<p>Page 290</p> <p>1 about -- we talked for like two hours. I was brutal. 2 "How did it end?" 3 "He said a lot of things that made 4 sense. He agreed he could treat me better." 5 And you say: Did you guys talk about 6 actually what's happening now? Expectations? 7 Future? 8 MR. GOLD: Scroll down. Scroll 9 down. Scroll down. Stop. 10 BY MR. GOLD: 11 Q. She then says: Danny got arrested. I 12 had to call his girlfriend. 13 What's that all about? 14 A. I think he got arrested like at an 15 event or a protest or something of that sort. 16 Q. And was he incarcerated? 17 A. I'm not sure. 18 MR. GOLD: Okay. Scroll down. 19 "Out no charges." 20 Okay. Stop. We're now on Exhibit 21 30. Scroll down. 22 BY MR. GOLD: 23 Q. This is January 17th. Is this another 24 exchange of texts between yourself and Lisa? 25 A. That's not between myself and Lisa.</p>
<p>Page 289</p> <p>1 MR. GOLD: Scroll down. Stop. 2 BY MR. GOLD: 3 Q. And you said: I just tried to hit that 4 video but I could -- like I could see it. 5 Is there a video she sent you? 6 A. In the text message above. 7 Q. What was that a video of, do you know? 8 A. I don't know. I couldn't see it. 9 Q. It says -- 10 MR. GOLD: Scroll up. Scroll 11 down. 12 BY MR. GOLD: 13 Q. -- "I'm still mad and you" -- 14 MR. GOLD: Stop. 15 BY MR. GOLD: 16 Q. -- "where is the video of you hitting 17 someone? And who is he talking about?" 18 "Patriot calling me a Nazi because of 19 my anti Zionist stance." 20 Is that Danny Thomas speaking? 21 A. I'm not sure what that one is. 22 Q. Okay. All right. And then you say: I 23 just tried to hit the video. 24 And then she writes: LOL. He hit a 25 guy today. Antifa. That's his hand. We talked</p>	<p>Page 291</p> <p>1 Q. Do you know who that is? 2 A. Who Patrick is? 3 Q. Yeah. 4 A. Yeah, I know who he is. 5 Q. Who is he? 6 A. A friend of Lisa's. 7 Q. Okay. Do you know whether Lisa ever 8 reported to Daniel Pipes the fact that Danny had been 9 arrested and for allegedly punching somebody during a 10 rally, did she -- do you know whether she reported 11 that to Daniel Pipes? 12 A. I don't know. 13 Q. Okay. 14 MR. CARSON: Does it matter? 15 BY MR. GOLD: 16 Q. Okay. So this is Exhibit -- I mean, 17 were you -- as I understand it, Danny Thomas was a 18 representative for the Tommy Robinson campaign; is 19 that correct? 20 A. I know he worked with Tommy Robinson. 21 I don't know exactly what his -- 22 Q. Having met -- having met Danny Thomas 23 and having heard these stories from Lisa about Danny 24 Thomas, were you concerned that MEF had any kind of 25 relationship to the Tommy Robinson campaign?</p>



<p>Page 292</p> <p>1 MR. CARSON: Object to form. What</p> <p>2 stories are you even talking about?</p> <p>3 MR. GOLD: I'm asking her whether</p> <p>4 having learned that Danny Thomas had</p> <p>5 been arrested at a rally, had been</p> <p>6 engaging in activities that were sultry</p> <p>7 at best, were you concerned that MEF had</p> <p>8 aligned itself with Danny Thomas.</p> <p>9 MR. CARSON: Object -- object to</p> <p>10 form, object to assuming facts not in</p> <p>11 evidence. What --</p> <p>12 BY MR. GOLD:</p> <p>13 Q. You can answer the question.</p> <p>14 MR. CARSON: What relationship are</p> <p>15 you even talking about.</p> <p>16 MR. GOLD: The fact that they were</p> <p>17 funding -- Danny Thomas was involved</p> <p>18 with the Robinson campaign. I'm asking</p> <p>19 her having met --</p> <p>20 MR. CARSON: She told you that --</p> <p>21 MR. GOLD: -- Danny Thomas --</p> <p>22 MR. CARSON: I'll -- you finish</p> <p>23 and then I'll put my response on the</p> <p>24 record.</p> <p>25 MR. GOLD: Yeah, yeah, listen, why</p>	<p>Page 294</p> <p>1 two factors alone did she not think it</p> <p>2 would be in the best interest of MEF if</p> <p>3 she reported that to Daniel Pipes.</p> <p>4 MR. CARSON: I'm going to object.</p> <p>5 I'm also going to tell her not to</p> <p>6 answer.</p> <p>7 MR. GOLD: Object to anything you</p> <p>8 want.</p> <p>9 BY MR. GOLD:</p> <p>10 Q. You can answer the question.</p> <p>11 MR. CARSON: At this point you're</p> <p>12 just trying to harass and embarrass the</p> <p>13 client with -- you're making up facts,</p> <p>14 you're making up evidence, you're</p> <p>15 mischaracterizing, you're --</p> <p>16 MR. GOLD: These are -- well,</p> <p>17 let's --</p> <p>18 MR. CARSON: You're not going to</p> <p>19 --</p> <p>20 THE COURT REPORTER: I can't hear</p> <p>21 you. I can't hear you.</p> <p>22 BY MR. GOLD:</p> <p>23 Q. Ms. McNulty, did you not learn through</p> <p>24 conversations with Lisa that Danny Thomas was</p> <p>25 arrested for assault?</p>
<p>Page 293</p> <p>1 don't you let me finish the question.</p> <p>2 All right?</p> <p>3 BY MR. GOLD:</p> <p>4 Q. My question is --</p> <p>5 MR. CARSON: She already testified</p> <p>6 that the money was funded and -- and the</p> <p>7 rally happened at a time when they first</p> <p>8 met the guy. Everything you're talking</p> <p>9 about happened after that. So what</p> <p>10 relationship exactly are you talking</p> <p>11 about? Did MEF have an ongoing</p> <p>12 relationship with this guy? Is that</p> <p>13 something --</p> <p>14 MR. GOLD: What are you talking</p> <p>15 about? That's even better yet.</p> <p>16 MR. CARSON: Okay. Well --</p> <p>17 MR. GOLD: She has now been told</p> <p>18 that Danny -- let's get the facts. --</p> <p>19 Danny Thomas was arrested for having had</p> <p>20 assaulted somebody at a rally, Danny</p> <p>21 Thomas was --</p> <p>22 MR. CARSON: When?</p> <p>23 MR. GOLD: -- engaging in revenge</p> <p>24 porn with Lisa, who is an employee of</p> <p>25 MEF, and I'm asking her based on those</p>	<p>Page 295</p> <p>1 MR. CARSON: Objection.</p> <p>2 BY MR. GOLD:</p> <p>3 Q. Answer the question.</p> <p>4 A. Yes.</p> <p>5 Q. Did you not learn from conversations</p> <p>6 with Lisa that Lisa was exchanging dick pics with</p> <p>7 Danny Thomas --</p> <p>8 MR. CARSON: Objection.</p> <p>9 BY MR. GOLD:</p> <p>10 Q. -- and was threatening to send -- and</p> <p>11 was threatening to send photographs to the mother of</p> <p>12 his children?</p> <p>13 MR. CARSON: Objection. You</p> <p>14 haven't shown her any dick pics.</p> <p>15 Talking about discussion about one.</p> <p>16 BY MR. GOLD:</p> <p>17 Q. You can answer the question.</p> <p>18 MR. CARSON: You can answer the</p> <p>19 question based on his hypothetical, the</p> <p>20 hypothetical dick pics --</p> <p>21 BY MR. GOLD:</p> <p>22 Q. Answer the question.</p> <p>23 MR. CARSON: -- you never saw.</p> <p>24 THE WITNESS: Yeah, she did tell</p> <p>25 me that she had --</p>

<p>Page 296</p> <p>1 BY MR. GOLD:</p> <p>2 Q. Okay.</p> <p>3 A. -- dick pics.</p> <p>4 Q. So knowing those two facts and knowing</p> <p>5 that MEF was involved in funding this rally with the</p> <p>6 Robinson campaign, did you not feel it would be</p> <p>7 appropriate to report back to Daniel Pipes that this</p> <p>8 behavior was disconcerting to you at best?</p> <p>9 MR. CARSON: Objection. Assuming</p> <p>10 facts not in evidence. The campaign</p> <p>11 you're talking about --</p> <p>12 BY MR. GOLD:</p> <p>13 Q. You can --</p> <p>14 MR. CARSON: The campaign you're</p> <p>15 talking about happened before what you</p> <p>16 just said, so how could she possibly</p> <p>17 tell them about something that hadn't</p> <p>18 happened yet?</p> <p>19 MR. GOLD: Your client just</p> <p>20 admitted -- she just admitted it</p> <p>21 happened. What are you talking about?</p> <p>22 MR. CARSON: The campaign happened</p> <p>23 in June of 2018. The dick pics you're</p> <p>24 talking about happened a year later. So</p> <p>25 how is she supposed to --</p>	<p>Page 298</p> <p>1 MR. GOLD: And I'm asking her --</p> <p>2 and I'm asking her --</p> <p>3 MR. CARSON: So what was she</p> <p>4 supposed to do, time machine, go six</p> <p>5 months into the future and then go back</p> <p>6 in time to warn him about what might</p> <p>7 happen?</p> <p>8 MR. GOLD: We're in January of</p> <p>9 2019 --</p> <p>10 MR. CARSON: She's not going to</p> <p>11 answer the question.</p> <p>12 MR. GOLD: My question is --</p> <p>13 THE COURT REPORTER: I can't hear</p> <p>14 you.</p> <p>15 MR. GOLD: -- why did she not in</p> <p>16 January of 2019 report this to Daniel</p> <p>17 Pipes.</p> <p>18 THE COURT REPORTER: Okay. Excuse</p> <p>19 me.</p> <p>20 MR. CARSON: Because they weren't</p> <p>21 in the relationship in 2019.</p> <p>22 THE COURT REPORTER: Excuse me.</p> <p>23 MR. CARSON: She's not going to</p> <p>24 answer the question.</p> <p>25 THE COURT REPORTER: Excuse me.</p>
<p>Page 297</p> <p>1 MR. GOLD: We're not going --</p> <p>2 we're not on June. We're on January of</p> <p>3 '19 now.</p> <p>4 THE COURT REPORTER: I can't hear</p> <p>5 either of you. I can't hear either of</p> <p>6 you.</p> <p>7 MR. CARSON: (Indiscernible)</p> <p>8 magical time machine --</p> <p>9 MR. GOLD: Seth, Seth, look at the</p> <p>10 text --</p> <p>11 MR. CARSON: -- go forward in the</p> <p>12 future --</p> <p>13 MR. GOLD: Seth, the text message</p> <p>14 is dated January 15th, 2019. If you had</p> <p>15 the exhibits --</p> <p>16 MR. CARSON: Correct.</p> <p>17 MR. GOLD: -- in front of you</p> <p>18 instead of playing with your kid all</p> <p>19 day, maybe you would know what I'm</p> <p>20 talking about.</p> <p>21 MR. CARSON: No, actually -- you</p> <p>22 actually just made my point, so thank</p> <p>23 you, that it's -- the exhibit you're</p> <p>24 showing her was in January 2019. The</p> <p>25 rally occurred in June 2018.</p>	<p>Page 299</p> <p>1 None of that was on the record because I</p> <p>2 couldn't hear either of you.</p> <p>3 MR. GOLD: I'm going to withdraw</p> <p>4 the line of questioning. I don't have</p> <p>5 any time to educate Mr. Carson on the</p> <p>6 facts.</p> <p>7 MR. CARSON: Yeah, I'm the one</p> <p>8 educating you, actually, but go ahead.</p> <p>9 MR. GOLD: I don't think so. I</p> <p>10 don't think so.</p> <p>11 MR. CARSON: I know so. That's</p> <p>12 why it's called an education --</p> <p>13 BY MR. GOLD:</p> <p>14 Q. In January of 2019, ma'am, what was</p> <p>15 your understanding of the relationship that Lisa had</p> <p>16 with Danny Thomas?</p> <p>17 A. They were intimate.</p> <p>18 Q. Okay. And at that point in time you</p> <p>19 had, in fact, learned that Danny Thomas at some point</p> <p>20 in time had been arrested, correct? For assault.</p> <p>21 Correct?</p> <p>22 A. In January of 2019.</p> <p>23 Q. January 2019. So my question to you,</p> <p>24 ma'am, is, in January of 2019 why did you not report</p> <p>25 that to Daniel Pipes?</p>

<p>Page 300</p> <p>1 A. Because the MEF wasn't working with 2 Danny anymore. He was -- they worked with him in 3 June of 2018 for a rally. But as far as I know there 4 was no continued work with Danny Tommo. 5 Q. In 2019. 6 A. Not that I know of. 7 Q. That's as far as you know. 8 MR. CARSON: I thought you were 9 going to withdraw this line of 10 questioning. She just -- I guess she 11 just explained to you what I tried to 12 explain to you to try to save you the 13 trouble of asking questions that are -- 14 MR. GOLD: Listen, you can do 15 whatever you want on redirect, I don't 16 really care, okay, what you do. The 17 fact of the matter is -- she answered 18 the question as to why she didn't report 19 it, and that's an adequate answer. 20 Okay? You're trying to -- you're acting 21 as if I'm trying to lead her into a 22 question that has no foundation when, in 23 fact, she's just admitted the two key 24 factors that support my question. 25 You're the one who is belaboring a moot</p>	<p>Page 302</p> <p>1 too. 2 MR. GOLD: Yeah, we went through 3 this one too. Go to 31. 4 BY MR. GOLD: 5 Q. She tells you that Matt just told me 6 not to message him anymore. 7 MR. GOLD: Scroll down. Scroll 8 down. Hold on. Hold on. Go back to -- 9 BY MR. GOLD: 10 Q. Again, are you in the gray or are you 11 in the blue? 12 A. Still in the blue. 13 Q. Okay. So you say: I texted Matt 14 earlier and no reply. Is he just done and never 15 going to talk to any of us ever again. 16 Okay. Had he left the organization at 17 that point? 18 A. He hadn't. He was fighting with Daniel 19 and he was threatening to leave. 20 Q. Okay. 21 "Matt just told me to" -- "not to 22 message him anymore. He said he's waiting for DP to 23 give him his letter of recommendation and then he's 24 leaving Philly and MEF as soon as possible, and to 25 please not message him anymore."</p>
<p>Page 301</p> <p>1 point. 2 MR. CARSON: That's not at all 3 what just happened, but -- 4 MR. GOLD: It's absolutely true. 5 She admitted the two predicate facts of 6 my question and she explained why she 7 didn't report it. There is nothing more 8 to it. There is nothing sinister about 9 the question. You're just so anxious to 10 jump in and make an objection. 11 What's the next exhibit? We're on 12 exhibit -- 13 MR. CARSON: (Indiscernible.) 14 MR. GOLD: Yeah, let the record 15 speak for itself. 16 We're now on Exhibit 29. 17 THE WITNESS: I think we're past 18 this. 19 MR. GOLD: Go to the highlighted 20 portion of 29. Stop. Go back. Go 21 back. Go back. Okay. Go back. Go 22 back to 29. Go back. Stop. Stop. We 23 covered this one. Go right to 30. Go 24 ahead, 30. Stop. 25 THE WITNESS: We just did this one</p>	<p>Page 303</p> <p>1 Okay. And Lisa responds: Same here. 2 And you say: What the fuck. 3 And she says: I honestly don't care 4 anymore. 5 And you say: It impacts me so much 6 though. I feel like his role changes are out of the 7 window now, I'm not taking on his job without any 8 training on how to do it. 9 Okay. And his job was director of 10 development, correct? 11 A. Correct. 12 Q. And you were concerned about taking 13 over his job because you hadn't had any training to 14 do that job, correct? 15 A. On how he did it, yeah. 16 Q. Okay. And -- 17 MR. GOLD: Scroll down. Stop. 18 BY MR. GOLD: 19 Q. And Lisa says: I know. I spoke to DP 20 and I'll call you in 20. 21 Was that Daniel Pipes she's referring 22 to? 23 A. Yes. 24 Q. Okay. And you said: Okay. Any time 25 after 3, on a Qatar call til then.</p>

<p>Page 304</p> <p>1 And then she writes: He even noticed I</p> <p>2 dyed my hair.</p> <p>3 Do you know who the "he" is?</p> <p>4 A. I don't.</p> <p>5 Q. Daniel Pipes? You don't? Okay.</p> <p>6 "Did he comment on how skinny minny you</p> <p>7 are?"</p> <p>8 "I brought it up and he said I look</p> <p>9 great. I sent a snap to sandman."</p> <p>10 Who is sandman, do you know?</p> <p>11 A. Patrick.</p> <p>12 Q. Okay.</p> <p>13 "Of course you do duh."</p> <p>14 MR. GOLD: And keep scrolling</p> <p>15 down. Okay. Stop.</p> <p>16 BY MR. GOLD:</p> <p>17 Q. "We just got an e-mail from him that</p> <p>18 basically said no one is getting raises or bonuses.</p> <p>19 So, I'm tweeting my resume tonight. Fuck all this."</p> <p>20 And the "him" is what? Matt?</p> <p>21 A. I don't remember.</p> <p>22 Q. Okay. So is that when you started</p> <p>23 sending out resumes for a new job?</p> <p>24 A. No.</p> <p>25 Q. Okay. So why did you send that</p>	<p>Page 306</p> <p>1 What were you talking about there?</p> <p>2 A. There was a lot of fighting between</p> <p>3 Gregg and Marnie during an event we held because they</p> <p>4 refused to talk to each other directly, so they would</p> <p>5 use me as the middleman to talk about financials.</p> <p>6 Q. Okay. All right.</p> <p>7 MR. GOLD: Okay. So let's scroll</p> <p>8 down. And now we're on Exhibit 32.</p> <p>9 Stop. Can you blow that up a little</p> <p>10 bit?</p> <p>11 BY MR. GOLD:</p> <p>12 Q. Is this another exchange between you</p> <p>13 and Marnie?</p> <p>14 A. Yeah, that's continuing the same one.</p> <p>15 Q. Okay. Do you want to take a chance --</p> <p>16 do you want to read that?</p> <p>17 A. Okay.</p> <p>18 MR. GOLD: Scroll down -- which</p> <p>19 exhibit is this? Scroll up. Scroll</p> <p>20 down. Scroll down. Okay. It's -- this</p> <p>21 is Exhibit 32 for the record. Okay.</p> <p>22 BY MR. GOLD:</p> <p>23 Q. So in that e-mail you say to -- I guess</p> <p>24 now you're back -- after you communicate with Marnie</p> <p>25 now you're communicating with Lisa, correct?</p>
<p>Page 305</p> <p>1 message?</p> <p>2 A. Because I was venting.</p> <p>3 Q. Okay. And then she writes back: I</p> <p>4 responded to Sam directly because I didn't want Gregg</p> <p>5 to have the passwords. I should have cc'd you.</p> <p>6 What passwords is she talking about?</p> <p>7 A. I don't know.</p> <p>8 Q. Okay. You say: What are you doing.</p> <p>9 Call me back.</p> <p>10 MR. GOLD: Scroll down. Keep</p> <p>11 going. Stop.</p> <p>12 BY MR. GOLD:</p> <p>13 Q. Looks like we have -- here is an</p> <p>14 exchange between Lisa and Marnie Meyer.</p> <p>15 MR. GOLD: Scroll down.</p> <p>16 BY MR. GOLD:</p> <p>17 Q. Is this Lisa and Marnie's exchange or</p> <p>18 is this your exchange with Marnie?</p> <p>19 A. This is my exchange with Marnie I</p> <p>20 think.</p> <p>21 Q. Okay. You said: I'm livid over the</p> <p>22 honorarium stuff and that I was involved at all.</p> <p>23 That wasn't my poor planning and I did all I could to</p> <p>24 try to get some communication between you and Gregg.</p> <p>25 It clearly won't be the case for the gala.</p>	<p>Page 307</p> <p>1 A. Correct.</p> <p>2 Q. And you say: I'm done with this bitch.</p> <p>3 What's the -- what was the story there?</p> <p>4 What's the context of that commentary?</p> <p>5 A. It was just being upset with Marnie at</p> <p>6 the time having to do that in-between portion of the</p> <p>7 finance between her and Gregg and her not</p> <p>8 understanding why that shouldn't have been.</p> <p>9 Q. Okay. So this is one of the many</p> <p>10 altercations or differences of opinion you had with</p> <p>11 Marnie while you were working at MEF?</p> <p>12 A. That was a difference of opinions, yes.</p> <p>13 Q. Okay. And we're now in January of 2019</p> <p>14 -- February of 2019, and would it be fair to say that</p> <p>15 this -- the problems you had, the interpersonal</p> <p>16 problems you had with Marnie, now had been going on</p> <p>17 for over a year?</p> <p>18 A. I mean, Marnie and I didn't have a ton</p> <p>19 of issues that came together between the two of us.</p> <p>20 I didn't always trust her based on things that were</p> <p>21 told to me, so I didn't talk to her very much outside</p> <p>22 of whatever was work communication and --</p> <p>23 Q. It was all work related, correct?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. So did you ever try to work out</p>



<p>Page 308</p> <p>1 these conflicts with her?</p> <p>2 A. Like I said, there weren't a ton of</p> <p>3 conflicts. It was -- that was like one argument that</p> <p>4 we had.</p> <p>5 Q. Well, you said you were done with this</p> <p>6 bitch. That's like past tense. So you're just done</p> <p>7 with her for that day?</p> <p>8 A. Yeah.</p> <p>9 Q. Okay.</p> <p>10 A. That moment.</p> <p>11 Q. And you considered -- and you</p> <p>12 considered her to be a bitch towards you, correct?</p> <p>13 A. At that moment.</p> <p>14 MR. GOLD: Let's go to Exhibit 33.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. Okay. Why don't you read through that</p> <p>17 exchange with Lisa. Looks like she shared an article</p> <p>18 with you from The Sun, Tommy Robinson drugs racist</p> <p>19 slur rant. Do you recall that?</p> <p>20 A. Vaguely.</p> <p>21 Q. Did you hit that link when you got it?</p> <p>22 A. Probably.</p> <p>23 Q. Okay. So you then say: Why would he</p> <p>24 record that?</p> <p>25 And you say -- that's what -- so were</p>	<p>Page 310</p> <p>1 A. Not that I know of.</p> <p>2 Q. Okay.</p> <p>3 MR. CARSON: Middle East Forum</p> <p>4 doesn't invest money into people's</p> <p>5 campaigns.</p> <p>6 MR. GOLD: What do you call it?</p> <p>7 What do you call it? Contributing money</p> <p>8 to person's campaign?</p> <p>9 MR. CARSON: The Middle East Forum</p> <p>10 is not allowed to make political</p> <p>11 contributions.</p> <p>12 MR. GOLD: They can -- you can --</p> <p>13 MR. CARSON: You might want to</p> <p>14 have a conversation --</p> <p>15 MR. GOLD: You can rehabilitate</p> <p>16 your witness, you can go through</p> <p>17 redirect, you can do whatever you want</p> <p>18 to do. Let me finish my deposition.</p> <p>19 All right?</p> <p>20 MR. CARSON: (Indiscernible).</p> <p>21 THE COURT REPORTER: I can't hear</p> <p>22 you.</p> <p>23 MR. CARSON: I'm trying to educate</p> <p>24 you --</p> <p>25 THE COURT REPORTER: Mr. Carson, I</p>
<p>Page 309</p> <p>1 you concerned that -- that Lisa was associated with</p> <p>2 Danny Thomas and this Tommy Robinson campaign given</p> <p>3 what you just read in that article on The Sun?</p> <p>4 A. I mean, Lisa's a big girl, she could</p> <p>5 handle herself. I wasn't --</p> <p>6 Q. Okay. So did you think about telling</p> <p>7 Daniel Pipes about this -- about what you had read?</p> <p>8 A. No. Again, as far as I know we weren't</p> <p>9 working with -- and they would -- any of this stuff</p> <p>10 that's out there in the internet they would know</p> <p>11 before I would --</p> <p>12 Q. Okay. But Lisa was -- Lisa had an</p> <p>13 ongoing relationship with Danny Thomas throughout</p> <p>14 this entire time, correct?</p> <p>15 A. That video was about Tommy Robinson.</p> <p>16 Q. I know. And Danny Thomas was part of</p> <p>17 -- part of that campaign, correct?</p> <p>18 A. I don't know if he still was. He</p> <p>19 wasn't always a part of the campaign.</p> <p>20 Q. Do you know whether MEF was putting any</p> <p>21 more money into the Robinson campaign as of February</p> <p>22 2019?</p> <p>23 A. We weren't holding rallies for him.</p> <p>24 Q. And do you know whether any money was</p> <p>25 being invested in that campaign at that point?</p>	<p>Page 311</p> <p>1 can't understand what you're saying.</p> <p>2 MR. CARSON: Your client is not</p> <p>3 permitted to make political</p> <p>4 contributions --</p> <p>5 MR. GOLD: And I'm not saying they</p> <p>6 did. Okay? I'm not saying they did.</p> <p>7 MR. CARSON: You asked her a</p> <p>8 question about a political campaign.</p> <p>9 Are we going to waste time with</p> <p>10 questions like these at 5:00?</p> <p>11 MR. GOLD: You've got your -- you</p> <p>12 got your objection on the record and</p> <p>13 that's fine and dandy. We're going to</p> <p>14 move on.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. So as far as you know, MEF was not</p> <p>17 involved paying any -- any legal cause in connection</p> <p>18 with the Robinson campaign at that point?</p> <p>19 A. Not that I know of.</p> <p>20 MR. GOLD: Okay. Go to exhibit --</p> <p>21 next exhibit which is 34.</p> <p>22 BY MR. GOLD:</p> <p>23 Q. Do you know who Twin Walton is?</p> <p>24 A. I know of him. I don't actually know</p> <p>25 him.</p>



<p>Page 312</p> <p>1 Q. Was Lisa involved in a relationship 2 with him?</p> <p>3 A. I mean, I can't recall everyone or -- 4 that Lisa's had a relationship with.</p> <p>5 Q. Who is -- who is Twin Walton?</p> <p>6 A. I know she met him in London. I don't 7 exactly know who he is.</p> <p>8 Q. Was he involved with the Robinson 9 efforts?</p> <p>10 A. I don't think so. I think he's like a 11 security person.</p> <p>12 Q. Okay. Security guard?</p> <p>13 A. I believe so.</p> <p>14 Q. Okay. Do you know why she would share 15 with you the conversation that she had with Twin 16 Walton?</p> <p>17 A. I can't see the conversation. I'm not 18 sure what --</p> <p>19 MR. GOLD: Do you want to blow 20 that up, Matt?</p> <p>21 THE WITNESS: Okay.</p> <p>22 BY MR. GOLD:</p> <p>23 Q. Do you have any reason to know why she 24 would share that with you?</p> <p>25 A. I don't know, just to show that he was</p>	<p>Page 314</p> <p>1 A. No, I think they were -- I mean, I 2 think it was justified to be -- it was just a blown 3 out of proportion scenario for everyone.</p> <p>4 Q. Why is that?</p> <p>5 A. Because it was just moving over the 6 calendars, there was no -- just doing work.</p> <p>7 Q. Okay. So really then it wasn't 8 justified, it was just moving over the calendar.</p> <p>9 MR. CARSON: Objection. Is that a 10 question?</p> <p>11 MR. GOLD: Let's move over to the 12 next exhibit, thirty -- let's go to 35, 13 of the yellow highlighted part. Keep 14 going. Okay. Here it is.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. "The whole thing is stupid, I can't 17 even believe she's acting like this and says these 18 things."</p> <p>19 Why don't you take a minute and read 20 that. Do you want to go up to the top of the page or 21 can you start there?</p> <p>22 A. I can start here I guess.</p> <p>23 Q. Do you know who you're referring to in 24 terms of who was offered the job?</p> <p>25 A. I don't think I've gotten to that point</p>
<p>Page 313</p> <p>1 being nice.</p> <p>2 Q. And then you said that you don't know 3 much about their relationship, correct?</p> <p>4 A. Correct, not that I can recall.</p> <p>5 Q. Were they going out at all, do you 6 know?</p> <p>7 A. What does that even mean, going out?</p> <p>8 Q. Well, were they having sex?</p> <p>9 A. I don't remember.</p> <p>10 Q. Did she tell you they had sex?</p> <p>11 A. I don't remember.</p> <p>12 MR. GOLD: Okay. Let's go on to 13 the next exhibit, 35. Stop there at the 14 yellow.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. This is Lisa telling you that Marnie 17 called screaming that I moved over the calendar for 18 everybody. "Oh my god. She's crazy."</p> <p>19 Looks like Lisa again was encountering 20 problems working with Marnie as of March of 2019. 21 Did you have any problems with Marnie as well in 22 March of 2019?</p> <p>23 A. I don't remember.</p> <p>24 Q. Do you know whether Lisa's complaints 25 about Marnie were justified or was she overreacting?</p>	<p>Page 315</p> <p>1 yet.</p> <p>2 Q. Okay.</p> <p>3 A. Okay.</p> <p>4 Q. Okay. What's the context of this 5 conversation?</p> <p>6 A. About the head of the office again.</p> <p>7 Q. In terms of who? Who are we talking 8 about here? It says: Look if Daniel offered her the 9 job.</p> <p>10 Who is "her"?</p> <p>11 A. Marnie.</p> <p>12 Q. Marnie. Okay. And what job did he 13 offer her?</p> <p>14 A. It said if, if Daniel offered her the 15 job of head of the office.</p> <p>16 Q. Head of the office? We're coming down 17 to that point -- we talked about at the Continental, 18 the point person?</p> <p>19 A. Correct, that never happened.</p> <p>20 Q. Okay. Well, I thought you said they 21 had taken a vote. That took place?</p> <p>22 A. We took a vote.</p> <p>23 Q. And that never happened.</p> <p>24 THE VIDEO SPECIALIST: Your volume 25 is very low.</p>

<p>Page 316</p> <p>1 MR. GOLD: I'm sorry, can you hear</p> <p>2 me? Yeah. I'm sorry.</p> <p>3 BY MR. GOLD:</p> <p>4 Q. So this was subsequent to that meeting</p> <p>5 at the Continental?</p> <p>6 A. Correct. That wasn't at the</p> <p>7 Continental, that meeting. That meeting was in the</p> <p>8 conference room at MEF.</p> <p>9 Q. Oh, in the conference room. Okay. And</p> <p>10 when was the luncheon at the Continental?</p> <p>11 A. I don't remember. It was in March of</p> <p>12 2019.</p> <p>13 Q. Well, was it before this meeting in the</p> <p>14 conference room or after?</p> <p>15 A. I think it was after.</p> <p>16 MR. GOLD: Okay. Go to the next</p> <p>17 exhibit. We're on -- we're on 36.</p> <p>18 BY MR. GOLD:</p> <p>19 Q. This is another exchange between you</p> <p>20 and Lisa, and she says: Someone has to tell Danny to</p> <p>21 fix this shit because it's fucking up Tommy's</p> <p>22 relationship with MEF or something like that just not</p> <p>23 so extreme.</p> <p>24 Do you know the context for that</p> <p>25 conversation?</p>	<p>Page 318</p> <p>1 MR. CARSON: By definition they're</p> <p>2 absolutely prohibited from engaging in</p> <p>3 any political activity.</p> <p>4 MR. GOLD: I think we know that.</p> <p>5 Scroll down.</p> <p>6 MR. CARSON: That includes funding</p> <p>7 campaigns or being involved in political</p> <p>8 campaigns.</p> <p>9 BY MR. GOLD:</p> <p>10 Q. And then she says to you: Did you get</p> <p>11 that message from Mr. Fink?</p> <p>12 And you said: I did. Gonna do it</p> <p>13 tomorrow.</p> <p>14 MR. GOLD: Keep scrolling. Go</p> <p>15 down to 37. Okay. Keep going to the</p> <p>16 yellow highlighted part. Could you blow</p> <p>17 up that -- okay. Stop.</p> <p>18 BY MR. GOLD:</p> <p>19 Q. This is a chat with Daniel Pipes. Is</p> <p>20 this -- were you involved in this chat or is this</p> <p>21 something Lisa sent you?</p> <p>22 A. No, this is between me and Daniel.</p> <p>23 Q. You and Daniel. Okay. Good.</p> <p>24 And who says "Matt appears to be</p> <p>25 playing games again"? Is that you?</p>
<p>Page 317</p> <p>1 A. I don't.</p> <p>2 Q. Well, at that point it appears as</p> <p>3 though MEF had some kind of relationship with the</p> <p>4 Tommy Robinson campaign, correct?</p> <p>5 A. I don't know if they did or if this is</p> <p>6 saying that this is hurting the fact that there can't</p> <p>7 be a relationship.</p> <p>8 Q. Well, it says: Someone has to tell</p> <p>9 Danny to fix this shit because it's fucking up</p> <p>10 Tommy's relationship with MEF.</p> <p>11 Seems to me that there is an ongoing</p> <p>12 relationship between Tommy Robinson and MEF, you just</p> <p>13 don't know about it?</p> <p>14 A. Not that I know of, no.</p> <p>15 Q. Okay. And she says: I'm getting</p> <p>16 depressed over it.</p> <p>17 And you say: What happened?</p> <p>18 MR. GOLD: Scroll down. Could you</p> <p>19 blow up that exchange there that looks</p> <p>20 like it's a -- scroll up.</p> <p>21 MR. CARSON: For the record, MEF</p> <p>22 is a 501(c)(3). By definition --</p> <p>23 MR. GOLD: I think I know that.</p> <p>24 Thank you very much for telling me that.</p> <p>25 Appreciate it.</p>	<p>Page 319</p> <p>1 A. Daniel.</p> <p>2 Q. Daniel. Okay.</p> <p>3 "He heard nothing, as there is no job</p> <p>4 description. I yesterday sent the announcement from</p> <p>5 2016 to Marnie and Gregg. That's all. I fail to</p> <p>6 understand why, if you are a candidate for the job,</p> <p>7 you expect to be part of the selection process. That</p> <p>8 only makes sense if you were not a candidate."</p> <p>9 So you then write: I don't expect to</p> <p>10 be part of the selection process but I've accepted</p> <p>11 the responsibility, at least in the interim --</p> <p>12 Were you saying that you were -- you</p> <p>13 thought you were the acting program director?</p> <p>14 A. No, I was the acting director of</p> <p>15 development at this time.</p> <p>16 Q. Development, okay. So -- and it's true</p> <p>17 you weren't -- you didn't think you would be part of</p> <p>18 the selection process at the time?</p> <p>19 A. I did not, no.</p> <p>20 Q. Okay. So what was the point you were</p> <p>21 trying to make in the context of this exchange with</p> <p>22 Mr. Pipes?</p> <p>23 A. I was upset that Gregg had gone to --</p> <p>24 had called Matt and told him things about MEF work</p> <p>25 that I didn't know and then Matt had called and told</p>

<p>Page 320</p> <p>1 me and after signing the NDA you shouldn't be telling</p> <p>2 MEF proprietary information to anyone who doesn't</p> <p>3 work at MEF.</p> <p>4 Q. Okay. And you then made this known to</p> <p>5 Mr. Pipes, and is that how he responded, "Matt</p> <p>6 appears to be playing games again, he heard nothing"?</p> <p>7 A. Correct.</p> <p>8 Q. Did Mr. Pipes tell you that he had</p> <p>9 spoken with Mr. Bennett?</p> <p>10 A. No.</p> <p>11 Q. Okay. Well, it seems like he did from</p> <p>12 this exchange. Was that what you -- you assumed that</p> <p>13 he spoke with Mr. Bennett?</p> <p>14 A. No, he's not saying that he spoke with</p> <p>15 Matt at all. He's saying that he thinks Matt is</p> <p>16 playing games with me.</p> <p>17 Q. Okay. Okay. And you made your</p> <p>18 position known.</p> <p>19 "I know you said you wanted to find a</p> <p>20 director before looking for a new DOD but I was under</p> <p>21 the impression that there was a probationary period</p> <p>22 for Gregg" --</p> <p>23 MR. GOLD: Scroll down.</p> <p>24 BY MR. GOLD:</p> <p>25 Q. -- "and therefore thought you might</p>	<p>Page 322</p> <p>1 truth at that point, right?</p> <p>2 A. That he hadn't spoken to Matt? Yes.</p> <p>3 Q. Correct. Okay. Good.</p> <p>4 And he says: I do not recall you</p> <p>5 asking me or agreeing to hold off until an</p> <p>6 announcement for you to prove yourself --</p> <p>7 Did you ask for time to prove yourself?</p> <p>8 A. I had talked about it with people in</p> <p>9 the office, yes.</p> <p>10 Q. Did you talk with Mr. Pipes about it?</p> <p>11 A. When he gave me the position we had</p> <p>12 talked about it, yes.</p> <p>13 Q. Okay. And when were you given the</p> <p>14 position?</p> <p>15 A. When Matt left.</p> <p>16 Q. So that would be March of 2019,</p> <p>17 correct?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. This is all in that same time</p> <p>20 period, correct?</p> <p>21 A. Correct.</p> <p>22 Q. Okay.</p> <p>23 -- so I fail to see how you could be</p> <p>24 upset that was not in my thinking. I am not a mind</p> <p>25 reader to know what your impression you had.</p>
<p>Page 321</p> <p>1 wait until that was set. I would have more time to</p> <p>2 prove myself. The news caught me off guard. It just</p> <p>3 does not feel good to learn the news concerning my</p> <p>4 job that could greatly impact my future was first</p> <p>5 told to a person who doesn't even work for the Forum</p> <p>6 while I remained in the dark."</p> <p>7 Are you referring to Mr. Bennett?</p> <p>8 A. And Gregg, the conversation between the</p> <p>9 two of them, yes.</p> <p>10 Q. Okay.</p> <p>11 MR. GOLD: And scroll down. Stop.</p> <p>12 It's the same thing. Go ahead.</p> <p>13 THE WITNESS: That wasn't the same</p> <p>14 thing.</p> <p>15 MR. GOLD: Right.</p> <p>16 BY MR. GOLD:</p> <p>17 Q. You then say that -- "to repeat, I told</p> <p>18 Matt nothing at all."</p> <p>19 A. That's Daniel.</p> <p>20 Q. "I'm not" -- pardon me?</p> <p>21 A. That's Daniel.</p> <p>22 Q. Yeah.</p> <p>23 "I told Matt nothing at all. I'm not</p> <p>24 in communication with him" --</p> <p>25 And you believed Daniel was telling the</p>	<p>Page 323</p> <p>1 And you say: I know you are not in</p> <p>2 communication with Matt and that was discussed</p> <p>3 between him and Gregg.</p> <p>4 And that's based on what Matt told you?</p> <p>5 A. Matt knew that the job description had</p> <p>6 already been -- was already in the works, so he had</p> <p>7 given me information that I would have in no other</p> <p>8 way known, so yes.</p> <p>9 Q. Well, how do you know that Gregg talked</p> <p>10 to Matt?</p> <p>11 A. Matt told me that he learned this from</p> <p>12 Gregg.</p> <p>13 Q. Okay. So you had conversations with</p> <p>14 Matt, and Matt told you he had conversations with</p> <p>15 Gregg.</p> <p>16 A. Correct, Matt told me Gregg had called</p> <p>17 him.</p> <p>18 Q. And when did that take place in</p> <p>19 relation to this conversation you had with Mr. Pipes?</p> <p>20 A. The same day.</p> <p>21 Q. Okay.</p> <p>22 "I reached out to you because I was mad</p> <p>23 at you for this but to make you" -- "I was not" -- "I</p> <p>24 was mad at you for this" --</p> <p>25 A. "Not because."</p>

<p>Page 324</p> <p>1 Q. -- "not because I was mad at you but to 2 make you aware that it is disheartening to be updated 3 this way and to be given the impression the decision 4 has already been made." 5 MR. GOLD: Scroll down. Stop. 6 Scroll down. Okay. 7 BY MR. GOLD: 8 Q. He says -- then Mr. Pipes says: As you 9 acknowledge I had nothing to do with the 10 communication with Matt, I don't understand why you 11 are complaining to me. If Gregg told him this, 12 complain to him, no? I am sorry if you are 13 disheartened but I don't believe I signaled in any 14 way that we would hold off looking for Matt's 15 permanent replacement. Nor am I clear why you think 16 we should do so; I figure it's best to have this job 17 permanently filled as soon as possible. Do you 18 disagree? It is not incumbent upon you to come to me 19 and ask for a delay so you can prove yourself, rather 20 than assume this is the intended course of action and 21 be then be disappointed when you learn of it again 22 it's not -- I am not a mind reader. I had no 23 knowledge until now what you expected. How could I? 24 MR. GOLD: Scroll down. 25 BY MR. GOLD:</p>	<p>Page 326</p> <p>1 in the office at this point, right? 2 A. He wasn't actually working from the 3 office, but he was given more responsibility on a 4 probationary period, as we were told it was supposed 5 to be, a probationary period, and that Daniel was 6 still supposed to be the person who was ultimately in 7 charge and that we would go to him directly and not 8 Gregg. 9 Q. Are you telling me you think that Gregg 10 was above Daniel Pipes in the pecking order? 11 A. No, I'm saying that Daniel said there 12 would be some sort of protection through him, but the 13 first -- as soon as I said that Gregg was already 14 doing things that he shouldn't be doing, Gregg told 15 me to go complain to -- Gregg -- Daniel told me to go 16 complain to Gregg about it and not him, he didn't 17 want to be bothered. 18 Q. Okay. So did you go to -- did you go 19 to Gregg and complain about it? 20 A. I mentioned something to Gregg about 21 the job role being created and he told me that it 22 hadn't gone out yet and that they were creating it 23 and that -- pretty much that was it, and Daniel and 24 him talked about the conversation between him and 25 Matt and he claims it doesn't -- never happened, but,</p>
<p>Page 325</p> <p>1 Q. And who said "I'm done"? Is that you? 2 A. Yes. 3 Q. Okay. You say: What time I coming in? 4 Should I wait for you downstairs? 5 And she says -- this is Lisa now -- 6 "seven minutes away in an Uber?" 7 A. Yeah. 8 MR. GOLD: Okay. Let's go to 9 Exhibit 39. 10 BY MR. GOLD: 11 Q. So were you satisfied with Daniel's 12 explanation? 13 A. No, I was very dissatisfied for 14 multiple reasons. 15 Q. Why? Why? 16 A. Well, one, he had said that even with 17 Gregg staying on, he wasn't leaving, he wasn't fired, 18 there weren't repercussions in that way, he said 19 that, you know, we would go to him now for things and 20 there -- we wouldn't have to worry about Gregg in 21 that manner, and the second I told him that Gregg did 22 something wrong he's like go complain to Gregg about 23 it, not me. So it was exactly the opposite of what 24 he said he was going to do. So -- 25 Q. Well, Gregg was back -- Gregg was back</p>	<p>Page 327</p> <p>1 I mean, at this point everything that they were doing 2 was -- 3 Q. Well, first of all, who was selected 4 for the job ultimately on a permanent basis? 5 A. I don't know. There was no one 6 selected by the time I left. 7 Q. Okay. And you were permitted to apply 8 for it, correct? 9 A. Correct. 10 Q. So I'm having difficulty -- what's the 11 problem? 12 A. The job role was being created by Gregg 13 and I wasn't even made aware of it yet that it was 14 being created and somebody outside of the 15 organization already knew that -- that information, 16 which shouldn't have happened, that should have been 17 illegal based on the NDA. Gregg was giving out 18 information he shouldn't have been giving. 19 Q. Okay. So that's your point, that 20 according to you under the NDA Gregg should not have 21 been talking to Mr. Bennett. Okay? But you're not 22 talking about the underlying, you know, interviewing 23 people for that position. You're not suggesting they 24 had to give you time to prove yourself before they 25 posted the job, is that what you're trying to say?</p>



<p>Page 328</p> <p>1 A. When Daniel gave me that position, when 2 he told me that I was going to be taking it on, he 3 did say -- we sat in his office and he told me this 4 is your time to show me exactly what you can do and 5 show me who you are because I don't know you. 6 Q. Okay. And you brought that up in your 7 conversation with Daniel and he responded 8 accordingly, so is that what you weren't happy with? 9 A. I wasn't happy with everything I just 10 mentioned. 11 Q. Okay. But I think you admitted that 12 you weren't even properly trained for that job 13 anyway, correct? 14 A. I wasn't trained by the person who was 15 doing it before me -- 16 Q. Right, because he's -- 17 A. -- which is -- 18 Q. -- no longer there, right? 19 A. Well, because he was threatening to 20 leave. That was in January. He didn't leave until 21 March. So I did end up -- he did end up showing me 22 exactly the way that he did it before he left. 23 Q. Okay. And did you meet all the 24 qualifications to be the director? 25 A. Yes.</p>	<p>Page 330</p> <p>1 A. Correct, but that doesn't change the 2 fact that proprietary information was given out and 3 that -- that doesn't change the fact that those 4 conversations didn't happen in March. 5 Q. Okay. And you reported that to 6 Mr. Pipes and he answered accordingly and you weren't 7 happy with his answer, correct? 8 A. He told me to go complain to Gregg. 9 Q. Okay. 10 A. Who is my -- 11 Q. And you weren't happy -- 12 A. -- sexual abuser, who has been -- 13 Q. And you weren't happy with that answer 14 -- 15 A. -- sexually abusing me since the moment 16 I stepped foot into that place and then the second he 17 wasn't in the office it was just changed to 18 retaliation and horrible -- it was -- 19 Q. When were you -- 20 A. -- a complete toxic workplace -- 21 Q. When were -- after November -- 22 A. -- from start to finish. 23 Q. After March of -- after -- after 24 November of 2018 when were you sexually abused by 25 Gregg?</p>
<p>Page 329</p> <p>1 Q. Okay. And when you finally left in 2 2019 had the position been filled yet? 3 A. No. 4 Q. Okay. So nobody filled that position, 5 so what's the point? 6 A. What's the point of what? 7 Q. What are you not happy with? No one 8 got that job, so what are you talking about? 9 A. Do I have to repeat all the reasons why 10 I wasn't happy at that time again? 11 Q. Well, no, because no one -- I just 12 don't understand -- it's a nonevent if nobody got the 13 job. 14 A. That's months later that you're talking 15 about. This is -- I left in September. That was in 16 -- 17 Q. I'm in March of 2019, okay, when you 18 had these conversations with Daniel, you were upset, 19 but the bottom line is even by the time you had 20 left -- 21 A. Those text messages -- 22 Q. -- no one -- 23 A. -- that you -- 24 Q. -- no one had been placed in that 25 position, correct?</p>	<p>Page 331</p> <p>1 A. That's when the retaliation began. 2 Q. No, you said you've been sexually 3 abused by Gregg since the time you were hired. I'm 4 asking you after November of 2018 -- 5 A. And I said until he left the office and 6 then the retaliation started. 7 Q. Okay. So you weren't sexually abused 8 after March of 2019 by Gregg, correct? 9 A. After March, yes; up until November 10 when he left, yes, the entire time. 11 Q. I'm talking after November -- after 12 November. 13 A. After November -- 14 Q. Yeah. 15 A. -- then the retaliation started. 16 Q. And what was the retaliation? 17 A. It was a constant telling us -- telling 18 me to do things five times over but not giving me an 19 explanation on what was wrong with things. He would 20 send me e-mails of highlighted items asking me to do 21 all of these things that weren't even in my job 22 description or sent him these things -- 23 Q. Were you ever placed on a performance 24 improvement plan? 25 A. No.</p>



<p>Page 332</p> <p>1 Q. Were you ever disciplined?</p> <p>2 A. No, but people who were completely</p> <p>3 forced to leave before were done the same way. It</p> <p>4 wasn't a we're going to put you on a performance</p> <p>5 plan, it's we're going to make you so uncomfortable</p> <p>6 that you have to leave --</p> <p>7 Q. Ma'am.</p> <p>8 A. -- because this is the worst --</p> <p>9 Q. Ma'am.</p> <p>10 A. -- place to ever be.</p> <p>11 Q. Okay. But it was the worst place to</p> <p>12 ever be but you wanted to be there for at least ten</p> <p>13 more years, correct?</p> <p>14 A. I started out thinking that. I didn't</p> <p>15 end thinking that.</p> <p>16 Q. Okay.</p> <p>17 A. Clearly.</p> <p>18 Q. And you didn't because you left for a</p> <p>19 better paying job ultimately anyway, correct?</p> <p>20 A. Yes, in a city where it's more</p> <p>21 expensive to live, so --</p> <p>22 Q. You could have --</p> <p>23 A. -- money had nothing to do with it.</p> <p>24 Q. You could have gone to Detroit or</p> <p>25 Cleveland. You picked New York.</p> <p>Page 333</p> <p>1 A. Correct, I did.</p> <p>2 Q. Maybe you should have considered, like,</p> <p>3 you know, Jackson Hole, Wyoming.</p> <p>4 A. Okay. Do you want to give me life</p> <p>5 lessons now, too?</p> <p>6 MR. GOLD: Let's go to Exhibit</p> <p>7 Number --</p> <p>8 BY MR. GOLD:</p> <p>9 Q. So just so I can be clear, you were</p> <p>10 never disciplined, you were never warned, you were</p> <p>11 never threatened with termination, prior to the point</p> <p>12 in time when you left the organization; is that</p> <p>13 accurate?</p> <p>14 A. I was just made to feel horrible all of</p> <p>15 the time so that I would want to leave.</p> <p>16 Q. Okay. Got it. But the answer to the</p> <p>17 question is, no, you were never disciplined, you were</p> <p>18 never placed on a PIP, you were never demoted, you</p> <p>19 were never -- salary was never reduced, and you were</p> <p>20 never threatened with termination, correct?</p> <p>21 A. Those things did not happen, no.</p> <p>22 Q. Okay.</p> <p>23 MR. GOLD: Let's go to Exhibit 39.</p> <p>24 Stop. Go back up -- this is the first</p> <p>25 highlighted -- yeah.</p>	<p>Page 334</p> <p>1 BY MR. GOLD:</p> <p>2 Q. "I hate" --</p> <p>3 MR. GOLD: Why don't you go to the</p> <p>4 top of the page. Scroll up for a</p> <p>5 minute. I just want to get the date of</p> <p>6 this exchange here. Okay.</p> <p>7 BY MR. GOLD:</p> <p>8 Q. So this is another exchange between you</p> <p>9 and Lisa. It says --</p> <p>10 MR. GOLD: Stop. Go back up to</p> <p>11 the top.</p> <p>12 BY MR. GOLD:</p> <p>13 Q. -- "Sandman" -- who I think is, what --</p> <p>14 is that Patrick?</p> <p>15 A. Yes.</p> <p>16 Q. -- "replied to my Snap story and said</p> <p>17 'let me eat some' and then said sorry I know you are</p> <p>18 wifed up and I" -- "and I friended me on Snapchat.</p> <p>19 What is happening."</p> <p>20 And you say: Those faces.</p> <p>21 What was your intention with that</p> <p>22 response?</p> <p>23 A. I don't know. It looks like there must</p> <p>24 have been a video or something before.</p> <p>25 Q. Okay.</p> <p>Page 335</p> <p>1 MR. GOLD: Let's scroll down then</p> <p>2 to the yellow highlighted part. Stop.</p> <p>3 Stop. Go back one line. Okay. Stop.</p> <p>4 Let's go back up. Go back up.</p> <p>5 THE WITNESS: Could we take a</p> <p>6 two-minute break, please?</p> <p>7 MR. GOLD: Yeah, sure.</p> <p>8 Off the record.</p> <p>9 THE VIDEO SPECIALIST: We are now</p> <p>10 off the record. The time is 5:30.</p> <p>11 (A brief recess was taken from</p> <p>12 5:30 p.m. to 5:34 p.m.)</p> <p>13 THE VIDEO SPECIALIST: We are now</p> <p>14 back on the record.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. This is a -- we're -- this is a text</p> <p>17 message exchange between you and Lisa dated March 19,</p> <p>18 2019, and it appears that you were on a cruise</p> <p>19 somewhere?</p> <p>20 A. Okay.</p> <p>21 Q. Is that accurate?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And then you get an e-mail from</p> <p>24 -- I'm sorry, a text message from Lisa "I hate to</p> <p>25 bother you on a trip but the investor said he'll be"</p>
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<p style="text-align: right;">Page 336</p> <p>1 -- "he'll take a meeting with us."  2 And you write back: Holy shit, I can't  3 curse, that's amazing.  4 Do you know who the investor was?  5 A. I don't, no.  6 Q. Was it Terry Giles?  7 A. It could have been. I don't know.  8 Q. Okay.  9 MR. GOLD: Do you want to scroll  10 down?  11 BY MR. GOLD:  12 Q. Lisa says: Oh my God. He's going to  13 be in London when I'm there.  14 And you say: No way. Are you going to  15 meet him there.  16 You still don't know who he is?  17 A. I don't remember.  18 Q. Okay. And this is roughly about --  19 this is, like I said, 2019. Okay.  20 She says: I just wrote him back saying  21 I actually will be in London on the 21st and 22nd as  22 well, can we meet there.  23 And she says: He's going to be there  24 for Tommy.  25 MR. GOLD: Scroll down. Stop.</p>	<p style="text-align: right;">Page 338</p> <p>1 Objection. We know for certain that the  2 person that we're talking about was  3 never a donor of MEF, so don't ask a  4 question --  5 BY MR. GOLD:  6 Q. Okay. So Terry Giles -- does this  7 refresh your memory now that the person she was going  8 to meet is Terry Giles?  9 A. I really don't remember, but if you're  10 saying --  11 Q. Okay. So explain to me again how does  12 she -- how does she walk away with a hundred thousand  13 dollars, Lisa, and a year off?  14 A. I don't remember the exact details. I  15 just remember that this was talking about, like, a  16 year employment for that amount of money.  17 Q. Is that a commission on an investment  18 or is that just a salary? What exactly -- you say  19 it's a hundred thousand dollar commission. What were  20 you talking about?  21 A. A salary.  22 Q. Not a commission.  23 A. Correct.  24 Q. Why did you use the word commission?  25 A. I don't remember.</p>
<p style="text-align: right;">Page 337</p> <p>1 Okay.  2 BY MR. GOLD:  3 Q. "I'm freaking out. I hope he can meet  4 me in London," she says.  5 And you say: And the toes.  6 What's that supposed to mean?  7 A. Crossing fingers.  8 Q. Oh, cross your fingers. Okay.  9 "When do you leave, tomorrow night?"  10 She says: Yes. I'm sick to my  11 stomach.  12 And then you say: Haha don't be.  13 You're going to be amazing and knock it out of the  14 park and walk away with a hundred thousand dollar  15 commission and a year off.  16 What were you talking about when you  17 say she would be entitled to a hundred thousand  18 dollar commission and a year off?  19 A. This was starting a new -- I don't know  20 the exact details, but the investor would have been  21 paying her an annual salary for a job if it came to  22 be.  23 Q. So she was soliciting a donor of sorts?  24 An investor?  25 MR. CARSON: Objection.</p>	<p style="text-align: right;">Page 339</p> <p>1 Q. And then she says to you: I don't want  2 to hear her off I'm on \$135,000 salary and you to  3 come with me at --  4 What's that word?  5 -- the same -- the same grand that's  6 what.  7 What did you understand that to mean?  8 A. That she didn't want a year off, she  9 wanted \$135,000 salary.  10 Q. In addition to the hundred thousand  11 dollar commission?  12 A. Instead of a hundred and a year off.  13 Q. Okay. And then you said: That would  14 be insane.  15 And she said: That's what I want.  16 And you said: Well work yo magic on  17 this angel. You can always win over these types.  18 What types are we talking about?  19 A. People in general. Everyone likes Lisa  20 when they meet her.  21 MR. GOLD: Okay. Scroll down.  22 Stop. Could you blow up this exchange  23 here? I can't read it. Scroll down.  24 Scroll down. Stop. Okay. That's the  25 next exhibit. Okay.</p>

<p>Page 340</p> <p>1 BY MR. GOLD:</p> <p>2 Q. So you don't know who the investor was</p> <p>3 and you don't know whether it was Terry Giles,</p> <p>4 correct?</p> <p>5 A. No, I don't remember.</p> <p>6 Q. Okay. And you don't know whether the</p> <p>7 investor was a donor to -- potential donor for MEF?</p> <p>8 A. I don't remember who the person was,</p> <p>9 but she wouldn't have asked for money from a donor.</p> <p>10 Q. Well, if it -- is Jerry -- is Mr.</p> <p>11 Giles, Terry Giles, a donor to MEF?</p> <p>12 A. I don't know offhand.</p> <p>13 Q. What if she were meeting with a donor</p> <p>14 for MEF and was cutting a side deal for her to make a</p> <p>15 hundred thousand dollars, would that be appropriate?</p> <p>16 MR. CARSON: Objection.</p> <p>17 THE WITNESS: Why are we talking</p> <p>18 about hypotheticals.</p> <p>19 MR. CARSON: And her opinion on</p> <p>20 the hypotheticals.</p> <p>21 BY MR. GOLD:</p> <p>22 Q. You can answer the question.</p> <p>23 MR. CARSON: You can answer -- you</p> <p>24 can answer your -- what your opinion is</p> <p>25 based on the hypothetical thing that</p>	<p>Page 342</p> <p>1 MR. CARSON: Objection. Same</p> <p>2 objection. Hypothetical opinion.</p> <p>3 BY MR. GOLD:</p> <p>4 Q. Under those circumstances would you</p> <p>5 have reported it to Daniel?</p> <p>6 A. I would have expected Lisa to report it</p> <p>7 to Daniel if she's the one who is actually meeting</p> <p>8 him and --</p> <p>9 Q. Let's say Lisa didn't report it to</p> <p>10 Daniel. Would you report it to Daniel?</p> <p>11 MR. CARSON: It's a hypothetical</p> <p>12 about a hypothetical.</p> <p>13 MR. GOLD: I know it's a</p> <p>14 hypothetical. Go ahead.</p> <p>15 THE WITNESS: Yes, if I knew that</p> <p>16 was the case.</p> <p>17 MR. CARSON: I'm going to object</p> <p>18 -- I'm going to object to the form of</p> <p>19 the question.</p> <p>20 MR. GOLD: Okay. Let's go to the</p> <p>21 next exhibit here. We're on Number 40</p> <p>22 now.</p> <p>23 MR. CARSON: I think we're also</p> <p>24 running out of time, but yeah.</p> <p>25 MR. GOLD: How much time do I</p>
<p>Page 341</p> <p>1 never happened that --</p> <p>2 MR. GOLD: Correct. Correct.</p> <p>3 MR. CARSON: I guess the question</p> <p>4 is would it be appropriate? Is that the</p> <p>5 question?</p> <p>6 MR. GOLD: Yeah, appropriate for</p> <p>7 her to make -- for her to solicit an</p> <p>8 investment from a MEF donor for a</p> <p>9 hundred thousand dollars.</p> <p>10 MR. CARSON: I would suggest it</p> <p>11 would be entirely appropriate. The</p> <p>12 witness is welcome to answer that, what</p> <p>13 she thinks.</p> <p>14 THE WITNESS: My opinion would be</p> <p>15 no.</p> <p>16 BY MR. GOLD:</p> <p>17 Q. Okay. And why is that?</p> <p>18 A. My personal opinion would be that MEF</p> <p>19 -- if we're soliciting money as employees from MEF</p> <p>20 for donations to MEF we wouldn't do anything off to</p> <p>21 the side unless it was spoken about with Daniel.</p> <p>22 Q. Okay. So you would have suggested that</p> <p>23 -- if, in fact, it was a donor, you would have</p> <p>24 reported to Daniel or would you expect that Lisa to</p> <p>25 report it to Daniel?</p>	<p>Page 343</p> <p>1 have?</p> <p>2 MR. CARSON: We started about</p> <p>3 10:10, so --</p> <p>4 MR. GOLD: I'm going to buzz</p> <p>5 through this. Let's go to Number 40.</p> <p>6 Stop.</p> <p>7 BY MR. GOLD:</p> <p>8 Q. At that point if you look at -- it says</p> <p>9 -- Lisa says to you: I'm -- that's it. I'm looking</p> <p>10 for a new job. Resume workshop tomorrow.</p> <p>11 Was Lisa, in fact, looking for a new</p> <p>12 job at that juncture?</p> <p>13 A. It's possible, yes. I don't know.</p> <p>14 Q. And you said: Oh God what happened?</p> <p>15 We're now in April of 2019.</p> <p>16 "But also, yes, I applied to like 20</p> <p>17 jobs on Monday night."</p> <p>18 Is that true?</p> <p>19 A. Yes, I started applying jobs in the</p> <p>20 spring of 2019.</p> <p>21 Q. Is that the first time you started</p> <p>22 applying, in April?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And she says: I sent you his</p> <p>25 response back to me. Fuck off dude.</p>

<p>1 Who is she talking about?</p> <p>2 A. I'm not sure.</p> <p>3 Q. Okay.</p> <p>4 MR. GOLD: Scroll down. Scroll</p> <p>5 down. Scroll down. We're on Exhibit 44</p> <p>6 now. Let's go back to Exhibit 42 for a</p> <p>7 second. Go to the yellow. Stop. Can</p> <p>8 you scroll up for one second? Is this</p> <p>9 Exhibit 42? Okay. Go to forty -- okay.</p> <p>10 BY MR. GOLD:</p> <p>11 Q. It says: Right why am I asking you you</p> <p>12 went off so I can't -- I don't call the same one --</p> <p>13 MR. GOLD: Keep going. Scroll</p> <p>14 down. Scroll down. Stop.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. She mentions: I'm looking at lawyers</p> <p>17 now. I don't want to double up or waste my time</p> <p>18 calling somebody that you already called. I'm</p> <p>19 looking at Murphy Law Group.</p> <p>20 And then you say: Sorry I'm driving,</p> <p>21 hold on. Sidney L. Gold and Associates.</p> <p>22 What was that exchange about?</p> <p>23 A. What lawyers we were going to call.</p> <p>24 Q. Okay. And did she actually call the</p> <p>25 Murphy Law Group? Do you know?</p>	<p>Page 344</p> <p>1 Q. Who is this individual? There's a</p> <p>2 photo here of somebody?</p> <p>3 A. Of Benjamin Baird.</p> <p>4 Q. Is he an employee of -- was he an</p> <p>5 employee of MEF at the time?</p> <p>6 A. Yes.</p> <p>7 Q. Who is he, do you know?</p> <p>8 A. What do you mean who is he?</p> <p>9 Q. Who was -- was he an employee of MEF?</p> <p>10 A. Yes, you just asked that and I said</p> <p>11 yes.</p> <p>12 Q. Okay. I didn't hear the yes. I'm</p> <p>13 sorry. So why would Lisa have taken a picture of him</p> <p>14 sleeping -- is that a hospital bed or is that an</p> <p>15 actual bed?</p> <p>16 A. That's an actual bed.</p> <p>17 Q. Do you know whether Lisa slept with</p> <p>18 him?</p> <p>19 A. Yes.</p> <p>20 Q. Is that what she told you?</p> <p>21 A. That they were intimately involved,</p> <p>22 yes.</p> <p>23 Q. Do you think her dating life and sex</p> <p>24 life was adversely impacting her employment at MEF?</p> <p>25 A. To be honest, it's not something I</p>
<p>Page 345</p> <p>1 A. I'm not sure.</p> <p>2 Q. And did you call my office?</p> <p>3 A. I did.</p> <p>4 Q. Okay. Who did you speak with, do you</p> <p>5 know?</p> <p>6 A. You.</p> <p>7 Q. Oh, me. Okay. And what did we talk</p> <p>8 about?</p> <p>9 A. We talked about the type of case that I</p> <p>10 was -- that I was looking at discussing with you --</p> <p>11 Q. Right.</p> <p>12 A. -- and then you asked me who the names</p> <p>13 of the people involved were --</p> <p>14 Q. Okay.</p> <p>15 A. -- and when I said Gregg's name, you</p> <p>16 said that it was a conflict of interest and you</p> <p>17 couldn't because of Gregg.</p> <p>18 MR. GOLD: All right. Scroll</p> <p>19 down. Scroll down. Stop. Scroll down.</p> <p>20 Go to the -- we're now on Exhibit 43.</p> <p>21 Go back to 42 for one minute. Are we on</p> <p>22 -- scroll up. Scroll down. Scroll</p> <p>23 down. Go -- keep going. Keep going.</p> <p>24 Keep going.</p> <p>25 BY MR. GOLD:</p>	<p>Page 347</p> <p>1 really think about her personal life outside of --</p> <p>2 Q. Did it have any impact on her</p> <p>3 employment positive or negative?</p> <p>4 MR. CARSON: Objection. Are we</p> <p>5 talking about when Gregg Roman sexually</p> <p>6 harassed her twice -- what are we</p> <p>7 talking about here?</p> <p>8 MR. GOLD: I'm talking the fact</p> <p>9 when she's sleeping with guys that work</p> <p>10 at MEF, okay, like Mr. Baird.</p> <p>11 MR. CARSON: Are we talking about</p> <p>12 (indiscernible) --</p> <p>13 MR. GOLD: That's what we're</p> <p>14 talking about, yeah. Listen, you have</p> <p>15 your chance --</p> <p>16 MR. CARSON: (Indiscernible.)</p> <p>17 MR. GOLD: You can ask her all the</p> <p>18 questions you want on redirect.</p> <p>19 THE COURT REPORTER: I can't hear</p> <p>20 anything Mr. Carson is saying.</p> <p>21 MR. CARSON: I don't have any</p> <p>22 questions. I have no questions --</p> <p>23 BY MR. GOLD:</p> <p>24 Q. My question is, ma'am -- you can answer</p> <p>25 yes or no.</p>



<p>Page 348</p> <p>1 MR. CARSON: Are we talking about</p> <p>2 --</p> <p>3 BY MR. GOLD:</p> <p>4 Q. Did the fact that she slept with Mr. --</p> <p>5 did the fact that she slept with Mr. Baird, did that</p> <p>6 have any impact on her employment at MEF?</p> <p>7 MR. CARSON: Objection. I'm going</p> <p>8 to instruct her not to answer that.</p> <p>9 MR. GOLD: On what grounds?</p> <p>10 MR. CARSON: It's designed to</p> <p>11 embarrass and harass.</p> <p>12 MR. GOLD: Because what?</p> <p>13 MR. CARSON: No relevance.</p> <p>14 MR. GOLD: Because of what?</p> <p>15 MR. CARSON: Designed only -- it's</p> <p>16 only -- it's designed only to embarrass</p> <p>17 and harass. Rape shield. It's a great</p> <p>18 --</p> <p>19 MR. GOLD: How does it embarrass</p> <p>20 her? She's not the one having sex with</p> <p>21 Mr. Baird, so how does it -- how is it</p> <p>22 harassing to her?</p> <p>23 MR. CARSON: She's such a slut so</p> <p>24 she -- so Gregg Roman should have</p> <p>25 sexually assaulted her, right? That's a</p>	<p>Page 350</p> <p>1 Let's go to the next exhibit.</p> <p>2 We're on now -- stop. Keep going.</p> <p>3 Stop. Okay.</p> <p>4 BY MR. GOLD:</p> <p>5 Q. By the way, you learned that Lisa was</p> <p>6 sleeping with Ben Baird, did you report it to anybody</p> <p>7 at MEF?</p> <p>8 A. No.</p> <p>9 Q. Did you ever observe Lisa flirting with</p> <p>10 any other MEF employees or contractors?</p> <p>11 MR. CARSON: Objection. Any</p> <p>12 other?</p> <p>13 MR. GOLD: Yeah, any other --</p> <p>14 MR. CARSON: Who did she flirt</p> <p>15 with?</p> <p>16 MR. GOLD: -- MEF employees or</p> <p>17 contractors.</p> <p>18 MR. CARSON: Who did she flirt</p> <p>19 with that -- she never -- you never</p> <p>20 established she flirted with anyone yet.</p> <p>21 Objection --</p> <p>22 MR. GOLD: I thought she said she</p> <p>23 slept with Ben Baird.</p> <p>24 MR. CARSON: Objection. Lack of</p> <p>25 foundation. Object to form.</p>
<p>Page 349</p> <p>1 great strategy you guys are developing.</p> <p>2 MR. GOLD: Well, I want to know --</p> <p>3 you're telling her not to answer the</p> <p>4 question because of the rape shield law,</p> <p>5 is that your objection?</p> <p>6 MR. CARSON: The question is</p> <p>7 designed solely to embarrass and harass.</p> <p>8 There is no basis --</p> <p>9 MR. GOLD: In what country? What</p> <p>10 law are you relying -- what's the legal</p> <p>11 authority for that objection?</p> <p>12 MR. CARSON: The legal authority</p> <p>13 is that you can -- is that when a</p> <p>14 question is designed solely to embarrass</p> <p>15 and harass the witness or to embarrass</p> <p>16 and harass period that they don't have</p> <p>17 to answer the question, they could be</p> <p>18 instructed not to answer --</p> <p>19 MR. GOLD: How does it embarrass</p> <p>20 her? She's already admitted that she</p> <p>21 knew that Lisa slept with him, so where</p> <p>22 is she -- embarrassed about what?</p> <p>23 MR. CARSON: My objection is</p> <p>24 noted.</p> <p>25 MR. GOLD: Okay. We'll move on.</p>	<p>Page 351</p> <p>1 You can answer.</p> <p>2 BY MR. GOLD:</p> <p>3 Q. Did she ever sleep with any other</p> <p>4 employees of MEF; yes or no?</p> <p>5 A. Not that I -- not that I know of, no.</p> <p>6 Q. Okay. That's all I wanted to know.</p> <p>7 MR. CARSON: Yeah, if she had I</p> <p>8 guess she deserves to be sexually</p> <p>9 assaulted by the director.</p> <p>10 MR. GOLD: Maybe that's your --</p> <p>11 maybe that's your logic coming into</p> <p>12 play, Mr. Carson.</p> <p>13 MR. CARSON: Seems to be the</p> <p>14 defense you're trying to establish.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. Did Ben Baird know -- did Ben Baird</p> <p>17 know that Lisa was taking pictures of him?</p> <p>18 A. I don't know.</p> <p>19 Q. Did you ask her why she sent you that</p> <p>20 picture?</p> <p>21 A. No.</p> <p>22 Q. When did you first decide -- you said</p> <p>23 you called my firm and Lisa was calling Michael</p> <p>24 Murphy. When did you finally meet with the Derek</p> <p>25 Smith Law Firm?</p>

<p>Page 352</p> <p>1 A. June 2019.</p> <p>2 Q. And is that -- who selected the Derek</p> <p>3 Smith Law Firm?</p> <p>4 A. Lisa had spoken with --</p> <p>5 MR. CARSON: Objection. What does</p> <p>6 that mean, who selected?</p> <p>7 MR. GOLD: Who set up the meeting.</p> <p>8 MR. CARSON: I --</p> <p>9 MR. GOLD: She already answered</p> <p>10 the question, so it's too bad. Okay?</p> <p>11 MR. CARSON: She hasn't answered</p> <p>12 the question. Objected to the question.</p> <p>13 MR. GOLD: She did answer the</p> <p>14 question. She said Lisa set it up.</p> <p>15 Can't you hear her? Pay attention.</p> <p>16 MR. CARSON: Yeah, I can hear.</p> <p>17 MR. GOLD: Pay attention. It's</p> <p>18 your witness. It's your client.</p> <p>19 MR. CARSON: Object -- I'm going</p> <p>20 to object to the question. She hasn't</p> <p>21 -- she didn't answer the question. I'm</p> <p>22 also going to let Tricia know when I</p> <p>23 object please do not respond until after</p> <p>24 my objections, but she -- the objection</p> <p>25 is based on the fact that the question</p>	<p>Page 354</p> <p>1 MR. GOLD: Okay. I'll ask it</p> <p>2 better yet.</p> <p>3 BY MR. GOLD:</p> <p>4 Q. Who -- okay. Did -- let me come back</p> <p>5 to this. Okay? Is that did you have any discussions</p> <p>6 with Lisa about starting a lawsuit against MEF?</p> <p>7 THE WITNESS: Seth, are you</p> <p>8 talking? Because nothing is -- I can't</p> <p>9 hear you.</p> <p>10 BY MR. GOLD:</p> <p>11 Q. Yeah, no, the question is, did you have</p> <p>12 any discussions with Lisa about starting a lawsuit --</p> <p>13 A. I can see Seth's microphone going,</p> <p>14 though.</p> <p>15 Q. What?</p> <p>16 A. I can see Seth's microphone going. I</p> <p>17 just wanted to make sure he wasn't talking before I</p> <p>18 said anything.</p> <p>19 Q. Okay. The question is, did you have</p> <p>20 any conversations with Lisa before you started this</p> <p>21 lawsuit against MEF?</p> <p>22 A. We talked about lawyers.</p> <p>23 MR. CARSON: You're allowed to</p> <p>24 talk about conversations you had with</p> <p>25 Lisa, not me, but with Lisa --</p>
<p>Page 353</p> <p>1 makes no sense. What do you even mean</p> <p>2 who selected the law firm --</p> <p>3 MR. GOLD: What makes sense to</p> <p>4 you, Mr. Carson, is much different than</p> <p>5 what makes sense to me. Okay? Let's</p> <p>6 just leave it at that.</p> <p>7 MR. CARSON: Yeah, well that --</p> <p>8 BY MR. GOLD:</p> <p>9 Q. Whose idea was it to file the lawsuit</p> <p>10 against MEF?</p> <p>11 MR. CARSON: -- question makes no</p> <p>12 sense.</p> <p>13 Objection. Who selected the --</p> <p>14 who selected the what?</p> <p>15 BY MR. GOLD:</p> <p>16 Q. Whose idea was it to file a lawsuit</p> <p>17 against MEF?</p> <p>18 MR. CARSON: You're asking a</p> <p>19 question about three different -- for</p> <p>20 what case? There is three -- there is</p> <p>21 --</p> <p>22 MR. GOLD: This case right here,</p> <p>23 this case, her case.</p> <p>24 MR. CARSON: You're asking</p> <p>25 Patricia McNulty in her case --</p>	<p>Page 355</p> <p>1 MR. GOLD: That's why the question</p> <p>2 is phrased that way to -- did she talk</p> <p>3 with Lisa, not you.</p> <p>4 THE WITNESS: Yes, we talked about</p> <p>5 --</p> <p>6 BY MR. GOLD:</p> <p>7 Q. Okay. Now, when did you --</p> <p>8 A. -- each going to a lawyer.</p> <p>9 Q. Okay. And when did that first -- that</p> <p>10 conversation first take place?</p> <p>11 A. I think it was still in June of 2019.</p> <p>12 Q. Where did it take place at?</p> <p>13 A. I don't remember.</p> <p>14 Q. Was it by phone? Was there -- did you</p> <p>15 have dinner? Was it a luncheon?</p> <p>16 A. There wasn't like a super long</p> <p>17 conversation on it. We were all just so frustrated</p> <p>18 at that point I think it was just I'm going to speak</p> <p>19 to a lawyer; I'm going to speak to a lawyer too.</p> <p>20 There wasn't a lengthy --</p> <p>21 Q. Were Ms. Yonchek and Ms. Brady part of</p> <p>22 those conversations?</p> <p>23 A. No.</p> <p>24 Q. Okay. So conversations were between</p> <p>25 you and Lisa alone.</p>

<p>Page 356</p> <p>1 A. Correct.</p> <p>2 Q. Okay. And you say they took place</p> <p>3 sometime in March or April of 2019?</p> <p>4 A. June of 2019 I think.</p> <p>5 Q. June of 2019. Okay.</p> <p>6 MR. GOLD: Let's go to Exhibit 45.</p> <p>7 Okay. Can you keep going down until you</p> <p>8 hit the yellow -- hit the highlighted</p> <p>9 part here. Keep going. Stop.</p> <p>10 BY MR. GOLD:</p> <p>11 Q. She writes to you: I fucked up at work</p> <p>12 today. I'm not concentrating on this job at all at</p> <p>13 the moment. I never sent the director of development</p> <p>14 announcement out. I'm fired. I just suck. Since I</p> <p>15 started this job nothing has ever been right. They</p> <p>16 got in my head and I don't live up to my potential.</p> <p>17 It makes me feel bad about myself.</p> <p>18 And you said: I went on LinkedIn and</p> <p>19 --</p> <p>20 A. It.</p> <p>21 Q. -- there's tons of people so it's fine.</p> <p>22 A. It went out on LinkedIn.</p> <p>23 Q. It went out on LinkedIn. Okay. What</p> <p>24 is the "it"?</p> <p>25 A. The director of development</p>	<p>Page 358</p> <p>1 accurate.</p> <p>2 MR. CARSON: You're asking her</p> <p>3 whether or not -- what is she, a</p> <p>4 psychiatrist now?</p> <p>5 MR. GOLD: Maybe one day she will</p> <p>6 be one. Okay? That's not the question.</p> <p>7 The question is here is someone stating</p> <p>8 her self-assessment of herself at the</p> <p>9 job that she's a total failure, and I'm</p> <p>10 asking you did you agree with that, yes</p> <p>11 or no. If the answer is no, fine.</p> <p>12 MR. CARSON: I'm going to object.</p> <p>13 There is nowhere that says total</p> <p>14 failure --</p> <p>15 MR. GOLD: Well, it says it right</p> <p>16 here, since I started this job nothing</p> <p>17 has been right, I fucked up at work</p> <p>18 today, I'm not concentrating on the job,</p> <p>19 they got in my head, I don't live up to</p> <p>20 my potential, it makes me feel bad about</p> <p>21 myself.</p> <p>22 MR. CARSON: Since I started at</p> <p>23 this job nothing has been right. It</p> <p>24 doesn't say nothing has been right at</p> <p>25 work. Maybe nothing has been right</p>
<p>Page 357</p> <p>1 announcement.</p> <p>2 Q. Okay. So at that point did you</p> <p>3 understand Lisa to have -- basically telling you that</p> <p>4 she was not really doing well in her job, to put it</p> <p>5 mildly?</p> <p>6 A. I understood that she was frustrated</p> <p>7 with herself at the -- in that moment.</p> <p>8 Q. Would you agree she wasn't living up to</p> <p>9 her potential at the job?</p> <p>10 A. I mean, this is my opinion, but I think</p> <p>11 she felt that way that day.</p> <p>12 Q. Okay. Well, it says she never --</p> <p>13 "since I started this job nothing right" -- "nothing</p> <p>14 has ever been right. They got in my head and I don't</p> <p>15 live up to my potential."</p> <p>16 A. Right.</p> <p>17 Q. Okay. Was that accurate?</p> <p>18 MR. CARSON: Objection. Object to</p> <p>19 form. Asking questions about someone --</p> <p>20 another person's --</p> <p>21 BY MR. GOLD:</p> <p>22 Q. You can --</p> <p>23 MR. GOLD: Well, that's her --</p> <p>24 that's a self-assessment by Lisa, and</p> <p>25 I'm asking her if she thought that was</p>	<p>Page 359</p> <p>1 because Gregg Roman sexually assaulted</p> <p>2 her twice --</p> <p>3 MR. GOLD: Maybe at the trial you</p> <p>4 can serve as an interpreter.</p> <p>5 MR. CARSON: -- (indiscernible) --</p> <p>6 THE COURT REPORTER: I can't hear</p> <p>7 you.</p> <p>8 MR. CARSON: -- (indiscernible)</p> <p>9 sexually assaulted her twice, sexually</p> <p>10 assaulted her coworker right in front of</p> <p>11 her, basically more or less --</p> <p>12 MR. GOLD: Mr. Carson, I</p> <p>13 understand you're getting tired, you're</p> <p>14 making senseless objections, wasting</p> <p>15 time.</p> <p>16 MR. CARSON: No, I'm not. I'm</p> <p>17 trying to --</p> <p>18 MR. GOLD: It's a simple question.</p> <p>19 Did you agree with that assessment or</p> <p>20 not; yes or no.</p> <p>21 MR. CARSON: The objection still</p> <p>22 stands.</p> <p>23 MR. GOLD: Why don't you direct --</p> <p>24 you're directing her not to answer the</p> <p>25 question?</p>

<p>Page 360</p> <p>1 MR. CARSON: No, she could answer 2 but I'm just putting an objection. 3 MR. GOLD: Then let her answer the 4 question. 5 MR. CARSON: So the objection is 6 based on the fact that you're asking her 7 opinion about some other person's frame 8 of mind based on the -- 9 MR. GOLD: And I got the objection 10 -- I got -- and I think she's fully 11 capable of having her own assessment of 12 the situation. You may think not or 13 otherwise, but let her answer the 14 question. 15 MR. CARSON: You can say whether 16 or not you think -- what was the 17 question, that she -- that that's 18 accurate? 19 MR. GOLD: Yeah, that's her 20 self-assessment, is it accurate. 21 MR. CARSON: So you can say 22 whether or not you think that's an 23 accurate self-assessment. It's just a 24 yes or no question. 25 THE WITNESS: I think the part</p>	<p>Page 362</p> <p>1 (A brief recess was taken from 2 6:00 p.m. to 6:04 p.m.) 3 THE VIDEO SPECIALIST: Back on the 4 record. It's 6:04 p.m. 5 MR. GOLD: Okay. So we're up to 6 Exhibit -- go back to 45 for one minute. 7 Let me see where we left off here. 45, 8 go up. Scroll up. Stop. Okay. Scroll 9 down. Scroll up for one minute, one 10 second go up there. Stop. Okay, scroll 11 down. Scroll down. Scroll down. Stop. 12 Okay. This is now Exhibit 45 -- 46, 13 rather. And scroll down a little bit. 14 BY MR. GOLD: 15 Q. And who is that a picture of? 16 A. Lisa -- 17 Q. Is that Lisa? 18 A. -- and Jaz. 19 Q. Okay. And do you know who Jaz is? 20 A. Yes. 21 Q. That's -- who is she? 22 A. She's the mother of Danny Thomas's 23 kids. 24 MR. GOLD: Okay. And let's go to 25 Exhibit 47. Let's stop. Keep going.</p>
<p>Page 361</p> <p>1 about nothing at that job being right 2 since the beginning is accurate in other 3 ways not pertaining to the work that we 4 did. 5 BY MR. GOLD: 6 Q. Well, of course, because Carson just 7 gave you the answer through his long speech about all 8 the sexual harassment that was experienced by her 9 back in March of 2018. Let's move on. 10 MR. GOLD: Let's go to Exhibit 11 Number 46. 12 THE COURT REPORTER: Excuse me. 13 Hold on. 14 MR. CARSON: I think we're 15 probably -- we're probably getting near 16 seven hours. Can we get a time check, 17 please? 18 THE COURT REPORTER: I was just 19 going to say I need a minute, so just 20 hold on one second. 21 MR. GOLD: Why don't you take a 22 minute then and we'll come back. All 23 right? 24 THE VIDEO SPECIALIST: Off the 25 record.</p>	<p>Page 363</p> <p>1 Stop. 2 BY MR. GOLD: 3 Q. This is an exchange again between you 4 and Lisa? 5 A. Uh-huh. 6 Q. It looks -- on July 15th she writes: I 7 miss you. I fucked up -- I fucked that shit up with 8 Charlie by sleeping with him. I know it. I'm 9 bummed. 10 Do you know who Charlie was? 11 A. Yes. 12 Q. Who is he? 13 A. A friend of hers. 14 Q. Another guy she slept with? 15 A. Yes. 16 Q. You said: Why do you say that? Did 17 you guys talk any more? 18 She says: A little. About sex. 19 Nothing yesterday. 20 MR. GOLD: Let's scroll down. 21 Stop. Scroll down. Back up to the top 22 of the exhibit for one second. Stop. 23 BY MR. GOLD: 24 Q. What is this a picture of? 25 A. Lisa's butt.</p>



<p style="text-align: right;">Page 364</p> <p>1 Q. Why is she sending that to you?</p> <p>2 A. Because she had a bruise on it.</p> <p>3 Q. Why is she sending it to you, though?</p> <p>4 MR. CARSON: Objection. Asked and</p> <p>5 answered.</p> <p>6 BY MR. GOLD:</p> <p>7 Q. Because it had a bruise on it, that's</p> <p>8 why she sent it to you?</p> <p>9 A. To show me the bruise.</p> <p>10 Q. And your answer was: Your ass looks</p> <p>11 great honestly.</p> <p>12 Correct?</p> <p>13 A. Correct.</p> <p>14 MR. GOLD: Okay. Scroll down.</p> <p>15 Let's go to 48.</p> <p>16 MR. CARSON: It's my understanding</p> <p>17 that the pictures like that are supposed</p> <p>18 to be attorneys' eyes only. What are we</p> <p>19 doing right now?</p> <p>20 MR. GOLD: As far as I know this</p> <p>21 is ripe for a deposition.</p> <p>22 MR. CARSON: No, it's not.</p> <p>23 MR. GOLD: Keep scrolling down.</p> <p>24 MR. CARSON: It's not. So we're</p> <p>25 going to have to -- we're going to have</p>	<p style="text-align: right;">Page 366</p> <p>1 MR. GOLD: Go down. Stop.</p> <p>2 BY MR. GOLD:</p> <p>3 Q. Lisa says: DP I just tried to fuck me</p> <p>4 and I screwed them. Dicks. Seth is calling me right</p> <p>5 now.</p> <p>6 What is that supposed to mean, if you</p> <p>7 know?</p> <p>8 A. I'm not sure.</p> <p>9 Q. Is DP Daniel Pipes?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And is Seth Seth Carson?</p> <p>12 A. Yes.</p> <p>13 Q. Okay.</p> <p>14 MR. GOLD: Scroll down. And this</p> <p>15 now is -- this is now -- we're in July</p> <p>16 of 2019. Scroll down. Let's go to</p> <p>17 Exhibit 48. Kind of move this along</p> <p>18 now. That was Exhibit 48. Go back up.</p> <p>19 Go back up to 48. Keep going. Okay.</p> <p>20 BY MR. GOLD:</p> <p>21 Q. Do you know what the context was for</p> <p>22 that discussion between you and Lisa?</p> <p>23 A. I don't remember.</p> <p>24 Q. Okay.</p> <p>25 MR. GOLD: Let's go to 49. Okay.</p>
<p style="text-align: right;">Page 365</p> <p>1 to go back and mark that -- I hope your</p> <p>2 clients --</p> <p>3 MR. GOLD: I'll agree to redact</p> <p>4 any and all pictures of Lisa, so don't</p> <p>5 be concerned about that.</p> <p>6 MR. CARSON: Yeah, and please -- I</p> <p>7 seriously hope that we're not -- that</p> <p>8 there is not a misunderstanding on your</p> <p>9 part and that your clients have now</p> <p>10 looked at images and photos that we had</p> <p>11 --</p> <p>12 MR. GOLD: No, they have not.</p> <p>13 They have not.</p> <p>14 MR. CARSON: -- designated</p> <p>15 attorneys' eyes only.</p> <p>16 MR. GOLD: All right?</p> <p>17 MR. CARSON: Yeah. I'm not sure I</p> <p>18 believe --</p> <p>19 MR. GOLD: And all those pictures</p> <p>20 -- we're going to redact all the</p> <p>21 pictures from this deposition before</p> <p>22 anything is ever filed with the Court.</p> <p>23 Let's go down --</p> <p>24 THE WITNESS: Is somebody eating</p> <p>25 on this call? Sorry.</p>	<p style="text-align: right;">Page 367</p> <p>1 Stop.</p> <p>2 BY MR. GOLD:</p> <p>3 Q. It says here -- it says: We'll talk</p> <p>4 later. Have fun with Neal.</p> <p>5 And then you say: Ugh, that's just</p> <p>6 making you sadder I know it. I fucking hate him,</p> <p>7 that he made you love him.</p> <p>8 Are you talking about Danny Thomas?</p> <p>9 A. Yes.</p> <p>10 Q. Okay.</p> <p>11 MR. GOLD: Scroll down. Okay.</p> <p>12 Stop.</p> <p>13 BY MR. GOLD:</p> <p>14 Q. There is a reference here -- Lisa says:</p> <p>15 You are like sleeping -- you are likely sleeping but</p> <p>16 I did see the telegram from Marc. Is he fucking</p> <p>17 serious.</p> <p>18 What's the backstory on that?</p> <p>19 A. I don't remember.</p> <p>20 Q. Is that Marc Fink she's referring to?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. You don't have any recollection</p> <p>23 as to what that's about?</p> <p>24 A. I don't.</p> <p>25 MR. GOLD: Okay. Let's go to</p>

<p style="text-align: right;">Page 368</p> <p>1 Exhibit 50. Stop. Go to the yellow</p> <p>2 highlighted portion. Stop. Okay.</p> <p>3 BY MR. GOLD:</p> <p>4 Q. It looks like Lisa's asking you to lend</p> <p>5 her a hundred dollars. Do you know what the</p> <p>6 backstory is on that?</p> <p>7 A. I don't --</p> <p>8 MR. CARSON: Who cares.</p> <p>9 THE WITNESS: I don't --</p> <p>10 MR. CARSON: Objection.</p> <p>11 MR. GOLD: I'm just asking if she</p> <p>12 recalls what it was -- what the hundred</p> <p>13 dollars was for, why she was borrowing a</p> <p>14 hundred dollars from her.</p> <p>15 MR. CARSON: Good question.</p> <p>16 THE WITNESS: I don't think -- I</p> <p>17 didn't ask.</p> <p>18 MR. GOLD: Okay. Scroll down. So</p> <p>19 let's go to the -- let's go to the --</p> <p>20 BY MR. GOLD:</p> <p>21 Q. Is that the first time she asked you to</p> <p>22 borrow money from you?</p> <p>23 A. I'm not sure.</p> <p>24 Q. Do you know whether -- yes or no? Was</p> <p>25 that the first time she had asked you to lend her</p>	<p style="text-align: right;">Page 370</p> <p>1 Q. Do you know -- do you know whether Will</p> <p>2 Chamberlain has any relationship to Raheem, whether</p> <p>3 they're friends or business relations? Raheem</p> <p>4 Kaseem.</p> <p>5 A. They're friends.</p> <p>6 Q. Okay. So you know they were friends.</p> <p>7 Okay. And do you know whether Lisa ever slept with</p> <p>8 Will?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Did she tell you that?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Did she have any -- was it a</p> <p>13 long-term relationship or just relatively short</p> <p>14 relationship, if you know?</p> <p>15 A. I don't remember.</p> <p>16 Q. Okay. So you don't recall much more</p> <p>17 about the relationship beyond what you already told</p> <p>18 me?</p> <p>19 A. No.</p> <p>20 Q. Okay. Do you know who Mike Yoder is?</p> <p>21 A. I don't think so.</p> <p>22 Q. Do you know whether Lisa ever had a</p> <p>23 lawyer by the name of Mike Yoder?</p> <p>24 A. Not that I know of.</p> <p>25 Q. Do you know whether she ever had a</p>
<p style="text-align: right;">Page 369</p> <p>1 money?</p> <p>2 A. I'm not sure.</p> <p>3 Q. Was she having any money problems as</p> <p>4 far as you knew, financial issues, IRS liens?</p> <p>5 A. I don't know.</p> <p>6 Q. Do you know whether she had an -- did</p> <p>7 she ever tell you that there was a IRS lien against</p> <p>8 her for a couple hundred grand, her and her husband?</p> <p>9 A. No, she never told me about a lien.</p> <p>10 MR. GOLD: Okay. Keep going.</p> <p>11 Let's go to Exhibit 51. Stop.</p> <p>12 BY MR. GOLD:</p> <p>13 Q. She says: I officially have a crush on</p> <p>14 Will.</p> <p>15 Do you know who that is, who Will is?</p> <p>16 A. Yes.</p> <p>17 Q. Who is that?</p> <p>18 A. I don't remember his last name offhand.</p> <p>19 Q. Well, is it Will Chamberlain?</p> <p>20 A. Yes, I think so.</p> <p>21 Q. Okay. And who was he?</p> <p>22 A. A person who she knows.</p> <p>23 Q. Was he the editor of a publication on</p> <p>24 -- Human Events, which is a conservative magazine?</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 371</p> <p>1 relationship with a Mike Yoder, sexual relationship?</p> <p>2 MR. CARSON: She just said she</p> <p>3 didn't know who the person is.</p> <p>4 THE WITNESS: Not that I know of.</p> <p>5 MR. CARSON: Objection.</p> <p>6 MR. GOLD: Okay. Let's move on to</p> <p>7 52. Keep going. Stop.</p> <p>8 BY MR. GOLD:</p> <p>9 Q. "Today is the big day. I have your</p> <p>10 letter but it's in my computer. I just want to say</p> <p>11 good luck."</p> <p>12 Is this the resignation letter that</p> <p>13 Lisa drafted for you?</p> <p>14 A. She looked at my letter and --</p> <p>15 Q. Did she revise it at all?</p> <p>16 A. Slightly, yes.</p> <p>17 Q. Okay. So you gave her the letter to</p> <p>18 revise? Who actually wrote it?</p> <p>19 A. I had given her a handwritten copy.</p> <p>20 Q. Okay. You gave her a handwritten copy</p> <p>21 and then she typed it and revised it to some extent?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. How much input did Lisa have in</p> <p>24 that resignation letter?</p> <p>25 A. I don't know the exact amounts.</p>

<p>Page 372</p> <p>1 Q. Was it changed -- do you still have the 2 handwritten copy? 3 A. I do not. 4 MR. CARSON: Objection. 5 BY MR. GOLD: 6 Q. Does Lisa still -- do you know whether 7 Lisa still has the handwritten copy? 8 A. I don't think she does. 9 Q. Okay. When did you give her the 10 handwritten copy? 11 A. In September of 2019. I don't know the 12 exact date. 13 Q. At or about September the 12th? 14 A. Just about before I think. 15 Q. Were you in -- working in Philadelphia 16 at the time or were you working in -- were you in 17 Washington DC or was Lisa already in Washington DC? 18 A. She was in Washington, I was in 19 Philadelphia. 20 Q. Okay. Had she already left MEF? 21 A. She had. 22 Q. Okay. So she was working for the 23 congressman already? 24 A. Yes. 25 Q. Okay. And how did she eventually --</p>	<p>Page 374</p> <p>1 about from work? 2 A. Yes. 3 Q. Okay. So MEF owned the iPad, and what 4 was your answer? "Yes, reset it." 5 What was that -- were you telling her 6 what to do, to reset the iPad to erase the pictures 7 or what were you -- what instructions were you giving 8 her? 9 A. No, she had -- you couldn't use the 10 iPad without an iCloud account, so she had put her 11 own private iCloud account into the iPad to be able 12 to use it for the radio station, and I took her 13 iCloud account off when she was gone. 14 Q. What radio station? 15 A. The MEF radio station. 16 Q. Okay. So you said: Yeah, reset it. 17 Did she -- do you know whether she 18 reset it after that? 19 A. No, I took her iCloud account off the 20 iPad. 21 Q. Oh, you took her -- okay. You took it 22 off for her. Okay. So who had the -- who had 23 possession of the actual iPad? 24 A. MEF did. I'm not sure -- 25 Q. Okay.</p>
<p>Page 373</p> <p>1 did she send you a letter via e-mail or did she mail 2 it to you or -- 3 A. Via e-mail. 4 Q. Okay. And you say: Oh my goodness, I 5 fell asleep early last night, it was a -- it was 6 glorious. Tomorrow is technically the day. And 7 thank you so much for helping with this. You are the 8 best. I love you so much. 9 MR. GOLD: Scroll down. Scroll 10 down. Stop. 11 BY MR. GOLD: 12 Q. She writes back: Tommy is free today. 13 Is that a reference to Tommy Robinson? 14 A. Yes. 15 Q. Okay. Do you know whether Lisa was 16 headed to the UK for -- to meet with Tommy Robinson 17 at about the time he was let out of jail? 18 A. I don't remember. 19 Q. Okay. 20 MR. GOLD: Let's go down to 21 Exhibit 53. 22 BY MR. GOLD: 23 Q. You -- she writes to you: Did we get 24 my pictures off the iPad. 25 Is that the work iPad we're talking</p>	<p>Page 375</p> <p>1 A. -- who had it in the office. 2 Q. Did you -- when you say you had it, did 3 you turn it in when you resigned? 4 A. I didn't have it. Somebody in the 5 office had it. 6 Q. Okay. So when she resigned from MEF 7 someone in the office had her iPad and then someone 8 reset it or you reset it? 9 A. It's the office iPad and she had left 10 her iCloud account attached to it, and I took her 11 iCloud account off that day. 12 Q. And who authorized you to do that? 13 MR. CARSON: Objection. She just 14 said Lisa authorized her to do it. 15 MR. GOLD: Lisa wasn't even 16 working there anymore. 17 MR. CARSON: It's her iCloud 18 account. 19 BY MR. GOLD: 20 Q. Who at MEF gave you authority to even 21 do anything with that iPad? 22 MR. CARSON: Objection. Assuming 23 facts not in evidence. Object to form. 24 You can answer. 25 BY MR. GOLD:</p>

<p>Page 376</p> <p>1 Q. Were you aware that Lisa and you both</p> <p>2 had -- had been given litigation hold letters at that</p> <p>3 point in time?</p> <p>4 MR. CARSON: Doesn't mean she has</p> <p>5 to let MEF have access to her --</p> <p>6 MR. GOLD: I'm not asking your</p> <p>7 interpretation of it, Seth. I'm asking</p> <p>8 her a question. What it means or what</p> <p>9 she does or what she thinks about it,</p> <p>10 that's not my concern right now.</p> <p>11 BY MR. GOLD:</p> <p>12 Q. My question is, were you aware of a</p> <p>13 litigation hold letter or preservation letter?</p> <p>14 A. Nothing was deleted.</p> <p>15 MR. CARSON: Objection. The</p> <p>16 witness has already answered the</p> <p>17 question.</p> <p>18 BY MR. GOLD:</p> <p>19 Q. Okay. Nothing was deleted, it was just</p> <p>20 reset.</p> <p>21 MR. CARSON: She didn't say she</p> <p>22 reset it. She said she took Lisa's</p> <p>23 iCloud off --</p> <p>24 MR. GOLD: No, she said she reset</p> <p>25 it. She said she reset it.</p>	<p>Page 378</p> <p>1 anymore.</p> <p>2 Q. Okay. And at that point you were still</p> <p>3 an MEF employee, correct?</p> <p>4 A. Correct.</p> <p>5 Q. Correct? You hadn't yet resigned at</p> <p>6 that point, correct?</p> <p>7 A. Correct.</p> <p>8 MR. GOLD: Okay. Let's go to the</p> <p>9 next exhibit. We're up to 54. Keep</p> <p>10 going. Keep it going. Keep it going.</p> <p>11 Keep it going. Keep it going. Oh,</p> <p>12 stop. Keep it going. Keep going. Go</p> <p>13 back to that picture.</p> <p>14 BY MR. GOLD:</p> <p>15 Q. Do you know who that is?</p> <p>16 A. Yes.</p> <p>17 Q. Who is it?</p> <p>18 A. Patrick.</p> <p>19 Q. That's Patrick Sandman?</p> <p>20 A. I believe so.</p> <p>21 Q. Okay. Do you know why she sent you</p> <p>22 that picture?</p> <p>23 A. To show me what her morning looked</p> <p>24 like.</p> <p>25 MR. GOLD: Okay. Keep -- next</p>
<p>Page 377</p> <p>1 MR. CARSON: That's not what she</p> <p>2 said.</p> <p>3 BY MR. GOLD:</p> <p>4 Q. Did you reset it?</p> <p>5 A. I took her iCloud account off of the</p> <p>6 iPad.</p> <p>7 Q. And how did you do that?</p> <p>8 A. I just went onto the iPad and took her</p> <p>9 iCloud off.</p> <p>10 Q. You said that you -- in this text</p> <p>11 exchange you said you reset it. Is that accurate or</p> <p>12 not accurate?</p> <p>13 A. What I meant by that was that I took</p> <p>14 her iCloud account off.</p> <p>15 Q. By simply deleting it or erasing it?</p> <p>16 A. By taking --</p> <p>17 MR. CARSON: Go ahead. You can</p> <p>18 answer it.</p> <p>19 THE WITNESS: By taking the</p> <p>20 account off. It doesn't delete</p> <p>21 anything. Everything is still in the</p> <p>22 cloud.</p> <p>23 BY MR. GOLD:</p> <p>24 Q. Okay.</p> <p>25 A. Just wasn't attached to that iPad</p>	<p>Page 379</p> <p>1 exhibit -- keep going. Scroll down.</p> <p>2 Stop. Okay.</p> <p>3 BY MR. GOLD:</p> <p>4 Q. It says: Jaz made a new fake Twitter</p> <p>5 account DM me out of nowhere.</p> <p>6 Do you understand what that meant?</p> <p>7 A. That Jaz created a fake Twitter account</p> <p>8 to direct message her.</p> <p>9 Q. Okay. And do you know why she did</p> <p>10 that?</p> <p>11 A. Why Jaz did that?</p> <p>12 MR. CARSON: Are you asking her</p> <p>13 why -- how could she know that.</p> <p>14 BY MR. GOLD:</p> <p>15 Q. Well, did she tell you that?</p> <p>16 MR. CARSON: Has she -- have you</p> <p>17 ever spoken to Jaz before in your life?</p> <p>18 THE WITNESS: I've never spoken to</p> <p>19 Jaz.</p> <p>20 BY MR. GOLD:</p> <p>21 Q. Okay. So when you learned of this,</p> <p>22 okay, did you ever tell any of your supervisors at</p> <p>23 MEF that Jaz had made -- set up a fake account --</p> <p>24 A. I wasn't working at MEF at this time.</p> <p>25 Q. Oh, you weren't working at that point</p>



<p>Page 380</p> <p>1 in time. Okay.</p> <p>2 Do you know whether anyone had actually</p> <p>3 spoken to Lisa, to the best of your knowledge, about</p> <p>4 interacting with Jazmin Bishop before she had left</p> <p>5 MEF?</p> <p>6 A. I don't know.</p> <p>7 Q. I take it Lisa never told you that she</p> <p>8 had any conversations with any supervisors about her</p> <p>9 interactions with Jazmin Bishop; is that accurate?</p> <p>10 A. Not that I remember.</p> <p>11 MR. GOLD: Okay. Let's go to 57.</p> <p>12 BY MR. GOLD:</p> <p>13 Q. By the way, who is Ryan Coyne?</p> <p>14 A. A friend of hers from DC.</p> <p>15 Q. Was Lisa dating Ryan Coyne at some</p> <p>16 point in time?</p> <p>17 A. Yes.</p> <p>18 Q. Is she still dating him to this day?</p> <p>19 A. I don't know.</p> <p>20 Q. When is the last time you spoke with</p> <p>21 Lisa about things outside of MEF?</p> <p>22 A. I don't know the exact last time. I</p> <p>23 would have to look.</p> <p>24 Q. Within the last month?</p> <p>25 A. Within the last month, yeah.</p>	<p>Page 382</p> <p>1 A. Her friend.</p> <p>2 Q. So she set up a fake account on Bumble</p> <p>3 with Allison's pic?</p> <p>4 A. I guess so.</p> <p>5 Q. Claiming that -- I guess -- claiming</p> <p>6 that she was Allison, I take it?</p> <p>7 A. Yeah.</p> <p>8 Q. Is that so she can monitor and see</p> <p>9 whether Ryan Coyne was accessing pictures on Bumble?</p> <p>10 (Voice on computer interrupts</p> <p>11 proceedings.)</p> <p>12 BY MR. GOLD:</p> <p>13 Q. Go ahead. That was my -- that's my</p> <p>14 computer.</p> <p>15 MR. CARSON: Ms. McNulty, do you</p> <p>16 know if Ms. Barbounis got MEF's</p> <p>17 authorization to set up a Bumble</p> <p>18 account?</p> <p>19 Are these questions even serious</p> <p>20 right now?</p> <p>21 BY MR. GOLD:</p> <p>22 Q. I want to know why -- I want to know --</p> <p>23 did she tell you why she set up a fake account under</p> <p>24 Allison's name, that's the question.</p> <p>25 A. I mean --</p>
<p>Page 381</p> <p>1 Q. Okay. And you don't know -- you don't</p> <p>2 know whether she's going out with Ryan Coyne right</p> <p>3 now?</p> <p>4 A. I don't.</p> <p>5 MR. GOLD: Okay. Let's go to</p> <p>6 Exhibit 57.</p> <p>7 THE VIDEO SPECIALIST: I just want</p> <p>8 to interject quickly, gentlemen. We're</p> <p>9 at 6 hours, 50 minutes on the record.</p> <p>10 MR. GOLD: We're going to be done,</p> <p>11 don't worry, we're getting there, I got</p> <p>12 three more exhibits to go.</p> <p>13 BY MR. GOLD:</p> <p>14 Q. She says to you: He's back on Bumble.</p> <p>15 I'm done. I set up a fake account with Allison's</p> <p>16 pic. Ryan's in Philadelphia.</p> <p>17 Can you tell me what that's about, if</p> <p>18 you know?</p> <p>19 A. I'm not sure who that's about.</p> <p>20 Q. Well, is she referring to Ryan Coyne</p> <p>21 setting up -- being on Bumble; is that a dating site?</p> <p>22 A. Bumble is a dating site. I'm not sure</p> <p>23 if she's talking about Ryan in that.</p> <p>24 Q. Well, what about her saying I set up a</p> <p>25 fake account with Allison's pic. Who is Allison?</p>	<p>Page 383</p> <p>1 Q. The answer is yes or no.</p> <p>2 A. -- she was talking about somebody in</p> <p>3 this, but I don't remember who the "he" is.</p> <p>4 Q. Okay. Well, she mentions Ryan's in</p> <p>5 Philly. Is that Ryan Coyne?</p> <p>6 A. Yes, that's in reference to Ryan.</p> <p>7 MR. GOLD: Okay. Let's go to</p> <p>8 number -- we're up to fifty -- go to 56.</p> <p>9 Sorry, stop. 58. Okay. Go down.</p> <p>10 Stop.</p> <p>11 BY MR. GOLD:</p> <p>12 Q. Here is an exchange -- do you want to</p> <p>13 go up a little further so you can get the context of</p> <p>14 it?</p> <p>15 Lisa says: I'm crushed. I just got</p> <p>16 drunk. I got it so bad.</p> <p>17 You say: Oh shit, that's not at all</p> <p>18 what I thought you were gonna say. What a dick. Did</p> <p>19 you guys end things?</p> <p>20 Are you talking about Ryan Coyne or</p> <p>21 someone else?</p> <p>22 A. I'm not sure.</p> <p>23 MR. GOLD: Could you go up -- pull</p> <p>24 it up a little bit? Stop. Little more.</p> <p>25 Okay. Go down.</p>

<p>Page 384</p> <p>1 BY MR. GOLD:</p> <p>2 Q. So you're not sure it's Ryan Coyne but</p> <p>3 you don't know who it is, correct?</p> <p>4 A. No.</p> <p>5 MR. GOLD: Okay. Stop. Go back</p> <p>6 up. Okay.</p> <p>7 BY MR. GOLD:</p> <p>8 Q. "Yes he can. After I went psycho.</p> <p>9 Crying wouldn't go home. Not good. I'm so</p> <p>10 embarrassed. I can't leave now because I want to</p> <p>11 talk to him."</p> <p>12 Anything in there refresh your</p> <p>13 recollection?</p> <p>14 A. I'm not sure who it was about.</p> <p>15 Q. Well, you say: I doubt it's as bad as</p> <p>16 you think but him fucking a bunch of girls isn't</p> <p>17 great.</p> <p>18 Any idea now who she's talking about?</p> <p>19 A. I'm not sure.</p> <p>20 Q. Okay.</p> <p>21 MR. GOLD: Let's go to the next</p> <p>22 one. Fifty -- let's go to 58. Let's</p> <p>23 get into the -- let's go to -- stop.</p> <p>24 BY MR. GOLD:</p> <p>25 Q. It says here the -- she says to you</p>	<p>Page 386</p> <p>1 Coyne?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And what was your -- do you know</p> <p>4 whether Lisa had a problem with alcohol? Was she an</p> <p>5 alcoholic?</p> <p>6 A. I don't think she's an alcoholic, no.</p> <p>7 Q. Okay. Well, did you have any</p> <p>8 conversations with her about this interaction she had</p> <p>9 with Ryan Coyne?</p> <p>10 A. I mean, she sent me that screen shot.</p> <p>11 Q. And what was your --</p> <p>12 A. This conversation is what we talked</p> <p>13 about.</p> <p>14 Q. Okay. And what was your perception of</p> <p>15 that conversation?</p> <p>16 A. My perception of her conversation with</p> <p>17 Ryan?</p> <p>18 Q. Yeah.</p> <p>19 A. That they were drunk and having an</p> <p>20 argument.</p> <p>21 Q. We want to know -- we know that Lisa</p> <p>22 was drunk. Was that -- she was running around the</p> <p>23 streets at 4 a.m. in the morning in Philadelphia. Is</p> <p>24 that where she was, in Philadelphia?</p> <p>25 A. I'm not sure.</p>
<p>Page 385</p> <p>1 "Lisa" --</p> <p>2 A. This is between her and Ryan.</p> <p>3 Q. Okay. This is Ryan Coyne.</p> <p>4 "Lisa if you don't get into an Uber and</p> <p>5 go home I'm going to have to call someone and I don't</p> <p>6 know" -- "don't want to do that."</p> <p>7 You said -- she says: Call who?</p> <p>8 And he says: The police. You are</p> <p>9 dangerously roaming the streets at 4 a.m. in the</p> <p>10 morning and don't know where you are. You're totally</p> <p>11 out of control.</p> <p>12 She says: LOL. And say what? Now you</p> <p>13 are acting crazy. I just want to be alone.</p> <p>14 MR. GOLD: Keep going.</p> <p>15 BY MR. GOLD:</p> <p>16 Q. "This is unbelievable that a grown</p> <p>17 woman and a mother would act this way. Be alone in</p> <p>18 an Uber" -- "be alone in a Uber home."</p> <p>19 And then she says: Pulling the mother</p> <p>20 card. You don't even know my kids' names.</p> <p>21 Do you recall Lisa telling you about</p> <p>22 this interaction she had with Ryan Coyne?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And she sent you a copy of the</p> <p>25 screen shots of the conversation she had with Ryan</p>	<p>Page 387</p> <p>1 MR. GOLD: Okay. Let's go to the</p> <p>2 next one. Let's go to Exhibit 59. Go</p> <p>3 to the highlighted part. Keep going.</p> <p>4 Keep going. Stop. Keep going. Keep</p> <p>5 going. Keep going. Stop.</p> <p>6 BY MR. GOLD:</p> <p>7 Q. Is that Ryan Coyne?</p> <p>8 A. I don't think so.</p> <p>9 Q. Who is that?</p> <p>10 A. I don't know who that is.</p> <p>11 Q. Did she ever tell you that she's been</p> <p>12 flying on a private plane recently with Ryan Coyne?</p> <p>13 A. Not that she's flown on it. She's told</p> <p>14 me she's seen one.</p> <p>15 Q. She has not been on the plane?</p> <p>16 A. I don't think so.</p> <p>17 Q. Okay. When did she tell you that?</p> <p>18 (Brief interruption.)</p> <p>19 BY MR. GOLD:</p> <p>20 Q. When did she tell you that?</p> <p>21 A. This was maybe a couple months ago.</p> <p>22 Q. Okay. Whose picture is this on this</p> <p>23 exhibit?</p> <p>24 A. I don't know who this is.</p> <p>25 Q. Is this someone else she had sex with?</p>

<p style="text-align: right;">Page 388</p> <p>1 A. Looks like it from that conversation.</p> <p>2 MR. GOLD: Okay. Let's go on next</p> <p>3 -- let's go to Exhibit 60. That was 60.</p> <p>4 61.</p> <p>5 BY MR. GOLD:</p> <p>6 Q. She says: They're back and they're</p> <p>7 trying to destroy my freaking life. It's all</p> <p>8 bullshit. It's public now.</p> <p>9 Do you know what she's talking about?</p> <p>10 A. I'm not sure.</p> <p>11 Q. This is now August 12th, 2020. You</p> <p>12 don't have any recollection? And who is that --</p> <p>13 A. No, I'm not --</p> <p>14 Q. -- a picture of? Who is that a picture</p> <p>15 of?</p> <p>16 A. I don't know.</p> <p>17 MR. GOLD: Let's go to 61. I'm</p> <p>18 sorry, 62. Stop. Keep going. Stop</p> <p>19 right there.</p> <p>20 BY MR. GOLD:</p> <p>21 Q. "Ok. So I wouldn't ask unless</p> <p>22 necessary. Any chance you can spot me a hundred</p> <p>23 until Tuesday" -- "Thursday."</p> <p>24 Is that -- we know that's now the</p> <p>25 second time she's asked to borrow money from you.</p>	<p style="text-align: right;">Page 390</p> <p>1 the number or you didn't have it?</p> <p>2 A. I didn't have it.</p> <p>3 MR. GOLD: Okay. Scroll down.</p> <p>4 BY MR. GOLD:</p> <p>5 Q. Who is that a picture of?</p> <p>6 A. Me and my fiance.</p> <p>7 MR. GOLD: Okay. Scroll down.</p> <p>8 Scroll down. Stop.</p> <p>9 MR. MAINEN: Hey, Sid, sorry to</p> <p>10 interrupt. That's the end of the</p> <p>11 exhibits.</p> <p>12 MR. GOLD: That's it? Okay. Then</p> <p>13 go -- scroll up for one second. Stop.</p> <p>14 Okay. Scroll up to -- one last shot at</p> <p>15 63. I just have one question and I'll</p> <p>16 be done.</p> <p>17 THE WITNESS: I think we're at</p> <p>18 time, so --</p> <p>19 MR. GOLD: Keep going. Keep</p> <p>20 going. Stop. We got it then. Okay.</p> <p>21 I'm done. Thank you.</p> <p>22 I have no further questions.</p> <p>23 THE WITNESS: Are we going off the</p> <p>24 record now?</p> <p>25 THE VIDEO SPECIALIST: Mr. Carson?</p>
<p style="text-align: right;">Page 389</p> <p>1 Did you give her the hundred?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Does she owe you any money?</p> <p>4 A. No.</p> <p>5 Q. She paid you back?</p> <p>6 A. Yeah.</p> <p>7 Q. Okay, good.</p> <p>8 MR. GOLD: Next. Let's go to 63.</p> <p>9 Go to the yellow highlighted part.</p> <p>10 Let's move it along. Go, go, go, go --</p> <p>11 stop.</p> <p>12 BY MR. GOLD:</p> <p>13 Q. Who is Sam Westeros, if you know?</p> <p>14 A. Sam -- I think that's a typo. I think</p> <p>15 she meant --</p> <p>16 Q. Yeah, it's actually -- should be</p> <p>17 Westrop.</p> <p>18 A. Yeah.</p> <p>19 Q. Okay. Who is he?</p> <p>20 A. He was an employee when we worked at</p> <p>21 MEF.</p> <p>22 Q. Okay. And she's asking for Sam's</p> <p>23 number?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And were you able to give her</p>	<p style="text-align: right;">Page 391</p> <p>1 MR. CARSON: Yeah, I think we're</p> <p>2 done, right?</p> <p>3 THE WITNESS: We can't hear you,</p> <p>4 Seth.</p> <p>5 MR. CARSON: I think we're done,</p> <p>6 right? Seven hours?</p> <p>7 MR. GOLD: Right. I know I'm</p> <p>8 done.</p> <p>9 MR. CARSON: All right. Thank</p> <p>10 you, everybody.</p> <p>11 MR. GOLD: Thank you, everybody.</p> <p>12 Have a good weekend. Be safe.</p> <p>13 THE VIDEO SPECIALIST: We are now</p> <p>14 off the record.</p> <p>15 ---</p> <p>16 (The proceedings concluded at 6:38 p.m.)</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

## C E R T I F I C A T E

I HEREBY CERTIFY that the proceedings and evidence are contained fully and accurately, to the best of my ability, in the notes of testimony taken by me in the proceedings of the above cause, and that the copy is a correct transcript of the same.

  
Carrie A. Kaufman

Registered Professional Reporter  
Notary Public



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22nd (1)

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24 (1)

24-hour (1)

28 (3)

2800 (1)

28th (2)

29 (3)

2950 (1)

29th (1)

2nd (3)

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3 (5)

3:27 (1)

3:30 (1)

3:35 (1)

30 (4)

300 (11)

30th (4)

31 (1)

32 (2)

33 (4)

34 (1)

35 (4)

36 (1)

37 (1)

39 (2)

391-4790 (1)

3rd (2)

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4 (7)

4:25 (1)

4:32 (2)

40 (3)

42 (3)

43 (1)

44 (1)

45 (4)

46 (2)

47 (1)

48 (4)

4848 (3)

49 (1)

4th (2)

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5 (7)

5:00 (7)

5:30 (2)

5:34 (1)

50 (2)

501(c)(3) (1)

51 (1)

515 (1)

52 (1)

53 (1)

54 (1)

56 (1)

569-1999 (1)

57 (2)

58 (2)

59 (1)

5th (1)

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6 (3)

6:00 (1)

6:04 (2)

6:38 (1)

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61 (2)

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65 (4)

66 (2)

665-2776 (1)

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7 (1)

7:30 (1)

70 (2)

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8 (3)

80 (1)

8th (2)

&lt; 9 &gt;

9 (3)

9:30ish (1)

91 (1)

9th (3)

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a.m (10)

ability (2)

able (11)

abroad (1)

absolutely (3)

absurd (2)

absurdity (1)

abused (3)

abuser (1)

abusing (1)

accepted (1)

access (5)

accessing (1)

accidentally (1)

accommodate (1)

accommodation (6)

account (42)

accounting (1)

accounts (1)

accuracy (2)

accurate (25)

accurately (2)

accusation (2)

accused (1)

acknowledge (1)

act (2)

acting (8)

ACTION (5)

actions (5)

active (1)

actively (3)

activities (1)

activity (2)

acts (1)

actual (5)

ADD (1)

Adderall (4)

addition (2)

Additionally (1)

address (26)

addresses (9)	angel (1)	arranged (1)	Avi (3)
adequate (1)	anger (2)	array (1)	avoid (2)
ADHD (1)	angry (3)	arrested (7)	awake (1)
admitted (8)	announcement (4)	article (2)	awakening (2)
adorable (1)	annoyed (2)	articles (1)	aware (25)
advance (2)	annoying (1)	Asana (1)	awareness (4)
advances (3)	annual (1)	asked (64)	awful (1)
advantage (1)	anonymously (1)	asking (66)	awkwardly (1)
adversely (1)	answer (150)	asleep (1)	
advice (3)	answered (38)	aspect (1)	< B >
advising (1)	answering (3)	ass (2)	babe (2)
advocacy (1)	answers (7)	assault (7)	babysitter (1)
advocate (1)	anti (1)	assaulted (6)	back (134)
affect (1)	antianxiety (1)	assessment (2)	background (2)
afraid (3)	anticipate (1)	assigned (1)	backing (1)
afternoon (3)	anticipation (1)	assigning (3)	backstory (2)
afterward (1)	Antifa (1)	assignment (1)	backwards (1)
age (2)	anxiety (2)	assistant (3)	bad (10)
agency (2)	anxious (1)	associated (4)	Baird (8)
agenda (3)	anybody (18)	ASSOCIATES (2)	balcony (1)
aggressive (1)	anymore (18)	association (1)	ball (1)
ago (13)	anyway (17)	assume (9)	bar (1)
agree (19)	apologize (3)	assumed (1)	BARBOUNIS (41)
agreed (4)	Apology (1)	assuming (13)	Barbounis's (4)
agreeing (1)	apparently (1)	assumption (2)	Barely (1)
agreement (5)	appear (3)	attach (1)	based (26)
ahead (35)	appearing (2)	attached (2)	basic (1)
ahold (2)	appears (11)	attempt (1)	basically (5)
AIPAC (2)	application (2)	attend (2)	basis (7)
al (2)	applications (1)	attendance (2)	bathroom (3)
alcohol (1)	applied (1)	attended (4)	bathtub (1)
alcoholic (2)	applies (1)	attending (2)	beach (1)
Alex (2)	apply (3)	attention (2)	bearing (1)
aligned (1)	applying (3)	attest (1)	beautiful (2)
allegations (4)	appoint (1)	attorney (3)	bed (3)
allegedly (1)	appointing (1)	attorney-client (1)	began (2)
Allison (2)	appointments (2)	attorneys (3)	begged (1)
Allison's (4)	appreciate (2)	attractive (1)	beginning (10)
allow (1)	appreciated (1)	attributed (1)	behalf (3)
allowed (5)	apprehension (3)	at-will (2)	behavior (7)
allowing (1)	appropriate (9)	audience (1)	belaboring (1)
alright (1)	approve (1)	August (2)	believe (33)
altercations (1)	approximately (1)	authenticate (1)	believed (1)
amazing (5)	approximation (1)	authority (4)	Ben (4)
ambivalent (1)	apps (1)	authorization (1)	benefits (1)
amended (4)	April (4)	authorized (2)	Benjamin (1)
amendment (1)	argue (1)	auto (1)	Bennett (30)
amount (4)	argument (6)	automatic (1)	best (15)
amounts (1)	argumentative (2)	automatically (2)	bet (1)

<b>better</b> (21)	<b>brought</b> (6)	<b>cell</b> (2)	<b>cloud-based</b> (1)
<b>betting</b> (1)	<b>bruise</b> (3)	<b>certain</b> (7)	<b>coffee</b> (1)
<b>beyond</b> (5)	<b>brutal</b> (1)	<b>certainly</b> (1)	<b>colleague</b> (1)
<b>big</b> (3)	<b>build</b> (1)	<b>CERTIFY</b> (1)	<b>come</b> (18)
<b>bigger</b> (3)	<b>building</b> (1)	<b>chain</b> (1)	<b>comes</b> (4)
<b>biggest</b> (1)	<b>bullshit</b> (2)	<b>Chamberlain</b> (2)	<b>Comical</b> (1)
<b>Bill</b> (1)	<b>Bumble</b> (6)	<b>chance</b> (6)	<b>coming</b> (14)
<b>bills</b> (3)	<b>bummed</b> (1)	<b>change</b> (9)	<b>comment</b> (7)
<b>Bishop</b> (2)	<b>bunch</b> (2)	<b>changed</b> (3)	<b>commentary</b> (1)
<b>bit</b> (8)	<b>bus</b> (3)	<b>changes</b> (2)	<b>commenting</b> (2)
<b>bitch</b> (5)	<b>business</b> (12)	<b>characteristics</b> (1)	<b>comments</b> (2)
<b>bitchy</b> (1)	<b>butt</b> (1)	<b>characterize</b> (1)	<b>Commission</b> (9)
<b>bits</b> (1)	<b>buy</b> (1)	<b>characterizing</b> (1)	<b>commitments</b> (1)
<b>bizarro</b> (1)	<b>buzz</b> (1)	<b>charge</b> (3)	<b>committed</b> (1)
<b>black</b> (3)	< C >	<b>charges</b> (1)	<b>common</b> (1)
<b>blame</b> (1)	<b>Caitriona</b> (4)	<b>Charlie</b> (2)	<b>Commonwealth</b> (1)
<b>blindly</b> (1)	<b>calculated</b> (1)	<b>chase</b> (1)	<b>communicate</b> (2)
<b>blow</b> (5)	<b>calendar</b> (2)	<b>chat</b> (2)	<b>communicating</b> (1)
<b>blown</b> (1)	<b>calendars</b> (1)	<b>chats</b> (4)	<b>communication</b> (11)
<b>blue</b> (9)	<b>California</b> (1)	<b>cheat</b> (2)	<b>communications</b> (25)
<b>board</b> (11)	<b>call</b> (41)	<b>cheated</b> (2)	<b>company</b> (3)
<b>Bog</b> (2)	<b>CALLED</b> (26)	<b>cheating</b> (4)	<b>comparison</b> (1)
<b>bonuses</b> (1)	<b>calling</b> (14)	<b>check</b> (5)	<b>compelled</b> (1)
<b>Boo</b> (1)	<b>Calls</b> (13)	<b>checks</b> (2)	<b>compiled</b> (1)
<b>book</b> (2)	<b>campaign</b> (18)	<b>Chelsea</b> (5)	<b>complain</b> (11)
<b>booked</b> (1)	<b>campaigns</b> (3)	<b>chicks</b> (1)	<b>complained</b> (2)
<b>booking</b> (2)	<b>cancelling</b> (1)	<b>child</b> (1)	<b>complaining</b> (13)
<b>books</b> (1)	<b>candidate</b> (2)	<b>children</b> (12)	<b>complaint</b> (12)
<b>borrow</b> (3)	<b>capable</b> (1)	<b>choice</b> (1)	<b>complaints</b> (15)
<b>borrowing</b> (1)	<b>Capitol</b> (1)	<b>chose</b> (1)	<b>complete</b> (1)
<b>boss</b> (9)	<b>card</b> (2)	<b>chosen</b> (1)	<b>completed</b> (1)
<b>bother</b> (2)	<b>cards</b> (4)	<b>Cinnamon</b> (1)	<b>completely</b> (1)
<b>bothered</b> (2)	<b>care</b> (10)	<b>circumstances</b> (3)	<b>compliment</b> (1)
<b>bothering</b> (2)	<b>career</b> (1)	<b>city</b> (1)	<b>complimented</b> (1)
<b>bottom</b> (3)	<b>cares</b> (2)	<b>CIVIL</b> (8)	<b>comply</b> (2)
<b>bought</b> (1)	<b>Carrie</b> (4)	<b>claim</b> (2)	<b>computer</b> (3)
<b>boundaries</b> (1)	<b>CARSON</b> (472)	<b>Claiming</b> (2)	<b>conceded</b> (1)
<b>Bowling</b> (1)	<b>case</b> (27)	<b>claims</b> (6)	<b>concentrating</b> (2)
<b>box</b> (1)	<b>cases</b> (3)	<b>clarify</b> (3)	<b>concern</b> (3)
<b>boy</b> (1)	<b>Cassandra</b> (1)	<b>clarifying</b> (1)	<b>concerned</b> (6)
<b>boyfriend</b> (2)	<b>caught</b> (1)	<b>clear</b> (20)	<b>concerning</b> (1)
<b>boys</b> (1)	<b>cause</b> (4)	<b>cleared</b> (1)	<b>concluded</b> (1)
<b>Brady</b> (2)	<b>caused</b> (1)	<b>clearly</b> (5)	<b>concludes</b> (2)
<b>break</b> (15)	<b>CAVAILER</b> (1)	<b>Cleveland</b> (1)	<b>conclusion</b> (5)
<b>breaking</b> (1)	<b>CAVALIER</b> (194)	<b>client</b> (18)	<b>condition</b> (2)
<b>Brexit</b> (1)	<b>CBD</b> (2)	<b>clients</b> (2)	<b>conduct</b> (1)
<b>brief</b> (11)	<b>cc'd</b> (2)	<b>close</b> (7)	<b>conference</b> (6)
<b>bring</b> (3)	<b>celebrate</b> (1)	<b>closed</b> (3)	<b>confidential</b> (1)
<b>Brody's</b> (1)		<b>cloud</b> (1)	<b>confirm</b> (3)

<b>confirmed</b> (1)	<b>couch</b> (2)	<b>Danny</b> (66)	<b>deposition</b> (25)
<b>conflict</b> (1)	<b>counsel</b> (23)	<b>dark</b> (1)	<b>depositions</b> (5)
<b>conflicts</b> (2)	<b>counsel's</b> (1)	<b>data</b> (1)	<b>depressed</b> (1)
<b>confused</b> (1)	<b>count</b> (2)	<b>date</b> (18)	<b>DEREK</b> (3)
<b>Congratulations</b> (1)	<b>counting</b> (1)	<b>dated</b> (6)	<b>describe</b> (2)
<b>Congressman</b> (9)	<b>country</b> (5)	<b>dates</b> (5)	<b>describing</b> (1)
<b>conjunction</b> (2)	<b>couple</b> (13)	<b>dating</b> (7)	<b>description</b> (4)
<b>connection</b> (5)	<b>course</b> (8)	<b>daughter</b> (1)	<b>deserves</b> (1)
<b>connects</b> (1)	<b>COURT</b> (67)	<b>daunting</b> (1)	<b>designated</b> (2)
<b>conservative</b> (1)	<b>cover</b> (1)	<b>day</b> (36)	<b>designed</b> (11)
<b>consider</b> (2)	<b>covered</b> (4)	<b>days</b> (6)	<b>destroy</b> (1)
<b>considered</b> (3)	<b>coworker</b> (1)	<b>DC</b> (7)	<b>detailed</b> (1)
<b>considering</b> (1)	<b>coworkers</b> (3)	<b>dead</b> (3)	<b>details</b> (5)
<b>constant</b> (2)	<b>Coyne</b> (14)	<b>deadline</b> (1)	<b>determination</b> (1)
<b>constantly</b> (1)	<b>COZEN</b> (2)	<b>deal</b> (3)	<b>determinations</b> (1)
<b>constitute</b> (1)	<b>crap</b> (1)	<b>dealing</b> (1)	<b>determine</b> (8)
<b>contact</b> (5)	<b>crazy</b> (4)	<b>deals</b> (1)	<b>determined</b> (4)
<b>contained</b> (5)	<b>create</b> (2)	<b>Dean</b> (2)	<b>Detroit</b> (1)
<b>containing</b> (7)	<b>created</b> (5)	<b>debate</b> (1)	<b>developing</b> (1)
<b>contains</b> (1)	<b>creates</b> (1)	<b>deceit</b> (1)	<b>development</b> (9)
<b>contempt</b> (5)	<b>creating</b> (1)	<b>December</b> (4)	<b>dick</b> (15)
<b>content</b> (4)	<b>credibility</b> (5)	<b>deception</b> (1)	<b>Dicks</b> (1)
<b>contents</b> (2)	<b>cried</b> (2)	<b>decide</b> (1)	<b>die</b> (1)
<b>context</b> (10)	<b>crimes</b> (1)	<b>decided</b> (2)	<b>difference</b> (3)
<b>Continental</b> (10)	<b>criminal</b> (1)	<b>decision</b> (2)	<b>differences</b> (1)
<b>continue</b> (6)	<b>cross</b> (1)	<b>deeply</b> (1)	<b>different</b> (14)
<b>continued</b> (2)	<b>Crossing</b> (1)	<b>defamatory</b> (1)	<b>difficult</b> (3)
<b>continues</b> (1)	<b>cruise</b> (1)	<b>default</b> (2)	<b>difficulties</b> (1)
<b>continuing</b> (1)	<b>crush</b> (1)	<b>defend</b> (1)	<b>difficulty</b> (1)
<b>continuously</b> (1)	<b>crushed</b> (1)	<b>Defendants</b> (7)	<b>dig</b> (1)
<b>contractors</b> (3)	<b>cry</b> (1)	<b>defendant's</b> (11)	<b>dinner</b> (3)
<b>Contributing</b> (1)	<b>crying</b> (3)	<b>defense</b> (3)	<b>direct</b> (11)
<b>contributions</b> (2)	<b>culmination</b> (1)	<b>definitely</b> (7)	<b>directing</b> (1)
<b>control</b> (3)	<b>cunt</b> (2)	<b>definition</b> (2)	<b>directly</b> (7)
<b>conversation</b> (65)	<b>cunts</b> (1)	<b>Delaney</b> (7)	<b>director</b> (24)
<b>conversations</b> (46)	<b>current</b> (5)	<b>delay</b> (1)	<b>disability</b> (1)
<b>convey</b> (1)	<b>currently</b> (1)	<b>delegating</b> (1)	<b>disagree</b> (2)
<b>conveyed</b> (1)	<b>curse</b> (1)	<b>delegator</b> (1)	<b>disagreement</b> (1)
<b>cooks</b> (1)	<b>cut</b> (4)	<b>delete</b> (5)	<b>disagrees</b> (1)
<b>coordinator</b> (1)	<b>cutting</b> (1)	<b>deleted</b> (15)	<b>disappointed</b> (1)
<b>copies</b> (2)		<b>deleting</b> (2)	<b>disciplined</b> (5)
<b>copy</b> (9)	<b>&lt; D &gt;</b>	<b>deliberately</b> (1)	<b>disconcerting</b> (1)
<b>core</b> (1)	<b>dad</b> (2)	<b>deliver</b> (1)	<b>discontinue</b> (2)
<b>Correct</b> (193)	<b>dads</b> (1)	<b>delve</b> (1)	<b>discovered</b> (1)
<b>correcting</b> (1)	<b>daily</b> (2)	<b>demoted</b> (1)	<b>discovery</b> (32)
<b>correctly</b> (1)	<b>dandy</b> (1)	<b>denied</b> (1)	<b>discrimination</b> (5)
<b>correspondence</b> (1)	<b>dangerously</b> (1)	<b>departed</b> (1)	<b>discuss</b> (3)
<b>correspondences</b> (1)	<b>Daniel</b> (104)	<b>depends</b> (1)	<b>discussed</b> (3)
<b>cost</b> (1)	<b>Daniel's</b> (2)	<b>deposed</b> (4)	<b>discussing</b> (4)



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 familiar (1)  
 family (4)

<b>fancy</b> (1)	<b>flat</b> (1)	<b>front</b> (3)	<b>God</b> (5)
<b>far</b> (20)	<b>flex</b> (4)	<b>frustrated</b> (5)	<b>goes</b> (10)
<b>fast</b> (2)	<b>flight</b> (5)	<b>frustration</b> (1)	<b>going</b> (296)
<b>favor</b> (1)	<b>flights</b> (2)	<b>fuck</b> (9)	<b>GOLD</b> (679)
<b>February</b> (13)	<b>flirt</b> (2)	<b>fucked</b> (4)	<b>Golden</b> (1)
<b>federal</b> (2)	<b>flirted</b> (1)	<b>fucking</b> (14)	<b>Goldstein</b> (2)
<b>feel</b> (26)	<b>flirting</b> (1)	<b>full</b> (4)	<b>gonna</b> (7)
<b>feeling</b> (14)	<b>flooded</b> (1)	<b>fully</b> (2)	<b>good</b> (37)
<b>feelings</b> (3)	<b>floor</b> (1)	<b>fun</b> (2)	<b>goodness</b> (1)
<b>feels</b> (2)	<b>Florida</b> (1)	<b>funded</b> (1)	<b>Google</b> (5)
<b>fees</b> (2)	<b>flown</b> (1)	<b>funding</b> (3)	<b>gorgeous</b> (1)
<b>fell</b> (4)	<b>fly</b> (1)	<b>funds</b> (2)	<b>gosh</b> (2)
<b>fellow</b> (2)	<b>flying</b> (2)	<b>funny</b> (2)	<b>gotten</b> (4)
<b>felt</b> (14)	<b>focus</b> (1)	<b>further</b> (6)	<b>governors</b> (8)
<b>female</b> (6)	<b>focusing</b> (1)	<b>Future</b> (4)	<b>gown</b> (1)
<b>females</b> (2)	<b>follow</b> (1)	<b>FYI</b> (1)	<b>grand</b> (2)
<b>FFS</b> (1)	<b>following</b> (1)		<b>gray</b> (7)
<b>fiance</b> (4)	<b>FOLLOWS</b> (1)	<b>&lt; G &gt;</b>	<b>Great</b> (8)
<b>fifth</b> (1)	<b>follow-up</b> (1)	<b>gala</b> (1)	<b>greatly</b> (1)
<b>fifty</b> (2)	<b>food</b> (2)	<b>games</b> (3)	<b>green</b> (2)
<b>fight</b> (5)	<b>foot</b> (2)	<b>gangs</b> (1)	<b>Gregg</b> (185)
<b>fighting</b> (6)	<b>forced</b> (3)	<b>gap</b> (1)	<b>Gregg's</b> (5)
<b>figure</b> (4)	<b>forcing</b> (1)	<b>Gary</b> (2)	<b>grooming</b> (1)
<b>figured</b> (1)	<b>foreign</b> (1)	<b>Gates</b> (1)	<b>ground</b> (1)
<b>figuring</b> (1)	<b>forever</b> (1)	<b>gather</b> (2)	<b>grounds</b> (1)
<b>file</b> (4)	<b>forget</b> (3)	<b>gay</b> (1)	<b>GROUP</b> (3)
<b>filed</b> (7)	<b>form</b> (27)	<b>gender</b> (4)	<b>grow</b> (1)
<b>filled</b> (3)	<b>formal</b> (1)	<b>general</b> (10)	<b>grown</b> (1)
<b>filtered</b> (1)	<b>formatted</b> (1)	<b>generally</b> (2)	<b>grumpy</b> (2)
<b>finalized</b> (1)	<b>former</b> (1)	<b>gentlemen</b> (2)	<b>guard</b> (2)
<b>finally</b> (3)	<b>forms</b> (3)	<b>genuinely</b> (1)	<b>guess</b> (34)
<b>finance</b> (2)	<b>forth</b> (2)	<b>George</b> (2)	<b>guesses</b> (1)
<b>financial</b> (2)	<b>forthright</b> (1)	<b>Georgie</b> (2)	<b>guessing</b> (2)
<b>financials</b> (3)	<b>forty</b> (1)	<b>gestures</b> (1)	<b>guidance</b> (1)
<b>find</b> (13)	<b>FORUM</b> (33)	<b>getting</b> (19)	<b>guy</b> (7)
<b>fine</b> (10)	<b>Forward</b> (6)	<b>gifs</b> (1)	<b>guys</b> (22)
<b>fingers</b> (2)	<b>forwards</b> (2)	<b>gift</b> (5)	
<b>finish</b> (11)	<b>found</b> (8)	<b>Giles</b> (6)	<b>&lt; H &gt;</b>
<b>Fink</b> (4)	<b>foundation</b> (6)	<b>Girl</b> (5)	<b>habit</b> (2)
<b>fire</b> (7)	<b>frame</b> (1)	<b>girlfriend</b> (1)	<b>hack</b> (1)
<b>fired</b> (22)	<b>freaking</b> (3)	<b>girls</b> (1)	<b>hacked</b> (1)
<b>firing</b> (5)	<b>free</b> (5)	<b>give</b> (36)	<b>haha</b> (5)
<b>firm</b> (6)	<b>free-for-all</b> (2)	<b>given</b> (22)	<b>hair</b> (1)
<b>first</b> (48)	<b>French</b> (1)	<b>gives</b> (3)	<b>hairstresser</b> (1)
<b>firsthand</b> (1)	<b>Friday</b> (1)	<b>giving</b> (12)	<b>half</b> (11)
<b>fit</b> (1)	<b>friend</b> (8)	<b>glad</b> (1)	<b>halfway</b> (1)
<b>five</b> (16)	<b>friended</b> (1)	<b>glorious</b> (1)	<b>hand</b> (2)
<b>five-minute</b> (2)	<b>friendly</b> (12)	<b>Gmail</b> (4)	<b>handbook</b> (1)
<b>fix</b> (4)	<b>friends</b> (10)	<b>go</b> (235)	<b>handed</b> (2)

<b>handful</b> (1)	<b>honestly</b> (3)	<b>improvement</b> (2)	<b>interaction</b> (4)
<b>handle</b> (2)	<b>honorarium</b> (1)	<b>inappropriate</b> (4)	<b>interactions</b> (4)
<b>handwritten</b> (5)	<b>hook</b> (1)	<b>in-between</b> (1)	<b>interest</b> (3)
<b>hang</b> (4)	<b>hooked</b> (1)	<b>inbox</b> (1)	<b>interested</b> (1)
<b>hanging</b> (2)	<b>hope</b> (7)	<b>incarcerated</b> (1)	<b>interesting</b> (1)
<b>happen</b> (17)	<b>Hopefully</b> (1)	<b>incident</b> (2)	<b>interference</b> (4)
<b>happened</b> (50)	<b>horrible</b> (2)	<b>include</b> (1)	<b>interim</b> (1)
<b>happening</b> (14)	<b>horror</b> (1)	<b>includes</b> (1)	<b>interject</b> (1)
<b>happens</b> (4)	<b>hospital</b> (1)	<b>including</b> (2)	<b>internet</b> (1)
<b>happy</b> (12)	<b>Hospitality</b> (4)	<b>inconvenient</b> (1)	<b>interpersonal</b> (1)
<b>harass</b> (14)	<b>host</b> (1)	<b>incorrect</b> (3)	<b>interpretation</b> (2)
<b>harassed</b> (1)	<b>hot</b> (1)	<b>increase</b> (1)	<b>interpreted</b> (3)
<b>harassing</b> (1)	<b>Hotel</b> (4)	<b>incumbent</b> (1)	<b>interpreter</b> (1)
<b>harassment</b> (4)	<b>hour</b> (3)	<b>INDEX</b> (2)	<b>interrelationship</b> (1)
<b>hard</b> (13)	<b>hours</b> (27)	<b>indicate</b> (2)	<b>interrupt</b> (4)
<b>harder</b> (1)	<b>hovering</b> (1)	<b>Indiscernible</b> (9)	<b>interrupting</b> (2)
<b>hate</b> (10)	<b>HR</b> (9)	<b>individual</b> (1)	<b>interruption</b> (3)
<b>hated</b> (1)	<b>Human</b> (1)	<b>inflammatory</b> (1)	<b>interrupts</b> (1)
<b>Head</b> (17)	<b>hundred</b> (17)	<b>influence</b> (4)	<b>interviewing</b> (1)
<b>headaches</b> (1)	<b>hung</b> (3)	<b>information</b> (23)	<b>intimate</b> (3)
<b>headed</b> (1)	<b>hungry</b> (1)	<b>inhibited</b> (1)	<b>intimately</b> (1)
<b>headhunter</b> (2)	<b>hurting</b> (2)	<b>inhibition</b> (1)	<b>invent</b> (1)
<b>hear</b> (50)	<b>husband</b> (14)	<b>initial</b> (1)	<b>invest</b> (1)
<b>heard</b> (19)	<b>hyperventilate</b> (2)	<b>initially</b> (2)	<b>invested</b> (1)
<b>hearing</b> (3)	<b>hypothetical</b> (13)	<b>initiated</b> (1)	<b>investment</b> (2)
<b>heart</b> (4)	<b>hypothetically</b> (1)	<b>injects</b> (1)	<b>investor</b> (6)
<b>heavy</b> (2)	<b>hypotheticals</b> (2)	<b>inpatient</b> (1)	<b>invite</b> (1)
<b>heck</b> (1)	<b>&lt; I &gt;</b>	<b>input</b> (1)	<b>invited</b> (2)
<b>he'd</b> (1)	<b>iCloud</b> (17)	<b>insane</b> (2)	<b>invites</b> (1)
<b>Held</b> (7)	<b>Icon</b> (4)	<b>inserting</b> (1)	<b>involved</b> (15)
<b>he'll</b> (2)	<b>idea</b> (16)	<b>Instagram</b> (23)	<b>iPad</b> (14)
<b>help</b> (2)	<b>identify</b> (2)	<b>instance</b> (2)	<b>iPhone</b> (3)
<b>helping</b> (2)	<b>ignoring</b> (1)	<b>instruct</b> (6)	<b>ironic</b> (1)
<b>hey</b> (8)	<b>ill</b> (2)	<b>instructed</b> (8)	<b>irritable</b> (1)
<b>high</b> (4)	<b>illegal</b> (1)	<b>instructing</b> (7)	<b>irritated</b> (1)
<b>highlighted</b> (21)	<b>illness</b> (1)	<b>instruction</b> (2)	<b>IRS</b> (2)
<b>Hill</b> (1)	<b>image</b> (1)	<b>instructions</b> (7)	<b>isolated</b> (1)
<b>hire</b> (2)	<b>images</b> (1)	<b>instructs</b> (1)	<b>Israel</b> (14)
<b>hired</b> (11)	<b>imagine</b> (2)	<b>insults</b> (1)	<b>issue</b> (7)
<b>history</b> (1)	<b>immediately</b> (1)	<b>int</b> (1)	<b>issued</b> (1)
<b>hit</b> (6)	<b>immersed</b> (1)	<b>intelligence</b> (1)	<b>issues</b> (5)
<b>hitting</b> (2)	<b>impact</b> (3)	<b>intended</b> (3)	<b>items</b> (1)
<b>hold</b> (11)	<b>impacting</b> (1)	<b>intending</b> (1)	<b>&lt; J &gt;</b>
<b>holding</b> (1)	<b>impacts</b> (1)	<b>intense</b> (1)	<b>Jackson</b> (1)
<b>Hole</b> (1)	<b>imperative</b> (1)	<b>intention</b> (1)	<b>jail</b> (5)
<b>Holy</b> (2)	<b>implicitly</b> (1)	<b>intentional</b> (1)	<b>January</b> (15)
<b>home</b> (9)	<b>important</b> (8)	<b>intentionally</b> (1)	<b>Jaz</b> (17)
<b>honcho</b> (1)	<b>impression</b> (5)	<b>intentions</b> (1)	<b>Jazmin</b> (3)
<b>honest</b> (1)		<b>interacting</b> (1)	

<b>jcavalier@cozen.com</b>	<b>language</b> (2)	<b>Lisa's</b> (17)	<b>major</b> (2)
(1)	<b>lap</b> (2)	<b>list</b> (3)	<b>making</b> (27)
<b>Jerry</b> (1)	<b>largely</b> (1)	<b>listen</b> (8)	<b>male</b> (2)
<b>job</b> (104)	<b>larger</b> (2)	<b>literally</b> (5)	<b>management</b> (4)
<b>jobs</b> (7)	<b>late</b> (3)	<b>litigation</b> (6)	<b>managing</b> (1)
<b>joke</b> (2)	<b>lately</b> (1)	<b>little</b> (17)	<b>manipulative</b> (1)
<b>Jon</b> (3)	<b>LAW</b> (9)	<b>live</b> (5)	<b>manner</b> (1)
<b>JONATHAN</b> (1)	<b>lawsuit</b> (9)	<b>livid</b> (1)	<b>manual</b> (2)
<b>journalists</b> (1)	<b>lawyer</b> (11)	<b>living</b> (1)	<b>Marc</b> (4)
<b>judge</b> (5)	<b>lawyers</b> (7)	<b>loathe</b> (1)	<b>March</b> (39)
<b>July</b> (2)	<b>lay</b> (1)	<b>logic</b> (1)	<b>mark</b> (3)
<b>jump</b> (3)	<b>lead</b> (1)	<b>LOL</b> (3)	<b>marked</b> (1)
<b>jumped</b> (2)	<b>leading</b> (1)	<b>London</b> (9)	<b>Market</b> (3)
<b>juncture</b> (3)	<b>learn</b> (6)	<b>long</b> (21)	<b>Marnie</b> (142)
<b>June</b> (13)	<b>learned</b> (5)	<b>longer</b> (5)	<b>Marnie's</b> (5)
<b>jury</b> (2)	<b>leave</b> (29)	<b>long-term</b> (1)	<b>material</b> (1)
<b>justified</b> (3)	<b>leaving</b> (6)	<b>look</b> (26)	<b>Matt</b> (142)
	<b>led</b> (1)	<b>looked</b> (8)	<b>matter</b> (11)
<b>&lt; K &gt;</b>	<b>Lee</b> (17)	<b>looking</b> (18)	<b>mattered</b> (1)
<b>Kaseem</b> (1)	<b>left</b> (75)	<b>looks</b> (32)	<b>Matthew</b> (1)
<b>Kassam</b> (2)	<b>legal</b> (8)	<b>lose</b> (5)	<b>Matt's</b> (1)
<b>Kaufman</b> (3)	<b>legit</b> (1)	<b>losing</b> (2)	<b>McNULTY</b> (34)
<b>keep</b> (89)	<b>legitimate</b> (2)	<b>lost</b> (8)	<b>mean</b> (96)
<b>keeping</b> (1)	<b>lend</b> (2)	<b>lot</b> (19)	<b>meaning</b> (4)
<b>kept</b> (1)	<b>lengthy</b> (1)	<b>Lots</b> (1)	<b>means</b> (9)
<b>Kevin</b> (1)	<b>lessons</b> (1)	<b>loud</b> (1)	<b>meant</b> (10)
<b>key</b> (1)	<b>letter</b> (10)	<b>love</b> (5)	<b>media</b> (10)
<b>kick</b> (1)	<b>letters</b> (3)	<b>loved</b> (11)	<b>medical</b> (1)
<b>kid</b> (1)	<b>letting</b> (1)	<b>loves</b> (1)	<b>medication</b> (1)
<b>kidding</b> (3)	<b>level</b> (1)	<b>loving</b> (1)	<b>medications</b> (1)
<b>kids</b> (5)	<b>leverage</b> (1)	<b>Lovitz</b> (1)	<b>meet</b> (12)
<b>kill</b> (7)	<b>Lewis</b> (2)	<b>low</b> (1)	<b>meeting</b> (29)
<b>kind</b> (18)	<b>liability</b> (1)	<b>luck</b> (2)	<b>meetings</b> (2)
<b>kinds</b> (1)	<b>liaison</b> (4)	<b>lucky</b> (1)	<b>MEF</b> (159)
<b>kinship</b> (1)	<b>Liberty</b> (1)	<b>lunch</b> (6)	<b>MEF's</b> (1)
<b>kissy</b> (1)	<b>lie</b> (7)	<b>luncheon</b> (8)	<b>Megan</b> (7)
<b>knew</b> (24)	<b>lied</b> (1)		<b>members</b> (1)
<b>knock</b> (1)	<b>lien</b> (2)	<b>&lt; M &gt;</b>	<b>memes</b> (1)
<b>know</b> (410)	<b>liens</b> (1)	<b>ma'am</b> (15)	<b>memory</b> (4)
<b>knowing</b> (2)	<b>life</b> (14)	<b>machine</b> (2)	<b>men</b> (1)
<b>knowledge</b> (8)	<b>lifetime</b> (5)	<b>mad</b> (7)	<b>Mental</b> (1)
<b>known</b> (6)	<b>light</b> (2)	<b>magazine</b> (1)	<b>mention</b> (2)
<b>knows</b> (4)	<b>liked</b> (11)	<b>magic</b> (1)	<b>mentioned</b> (9)
	<b>likes</b> (2)	<b>magical</b> (1)	<b>mentioning</b> (2)
<b>&lt; L &gt;</b>	<b>line</b> (13)	<b>maiden</b> (1)	<b>mentions</b> (2)
<b>lack</b> (4)	<b>lined</b> (1)	<b>mail</b> (2)	<b>message</b> (47)
<b>ladies</b> (3)	<b>link</b> (2)	<b>mailchimp</b> (2)	<b>Messages</b> (60)
<b>laid</b> (1)	<b>LinkedIn</b> (7)	<b>Mainen</b> (14)	<b>Messenger</b> (1)
<b>landline</b> (1)	<b>LISA</b> (266)	<b>MAJA</b> (2)	<b>met</b> (21)

<b>methods</b> (2)	<b>monitoring</b> (1)	<b>Neither</b> (2)	<b>occurred</b> (9)
<b>Meyer</b> (3)	<b>month</b> (8)	<b>never</b> (66)	<b>occurring</b> (1)
<b>mic</b> (2)	<b>months</b> (12)	<b>new</b> (24)	<b>O'CONNOR</b> (2)
<b>Michael</b> (1)	<b>moot</b> (1)	<b>news</b> (3)	<b>October</b> (4)
<b>microphone</b> (4)	<b>moral</b> (1)	<b>nice</b> (4)	<b>odd</b> (1)
<b>MIDDLE</b> (19)	<b>morality</b> (1)	<b>nickel</b> (1)	<b>offensive</b> (1)
<b>middleman</b> (1)	<b>morning</b> (15)	<b>night</b> (13)	<b>offer</b> (2)
<b>midweek</b> (1)	<b>mornings</b> (1)	<b>nine</b> (1)	<b>offered</b> (4)
<b>Mike</b> (3)	<b>mother</b> (8)	<b>nod</b> (1)	<b>offering</b> (1)
<b>mildly</b> (1)	<b>motion</b> (1)	<b>nods</b> (2)	<b>offhand</b> (8)
<b>million</b> (2)	<b>motions</b> (1)	<b>noise</b> (2)	<b>office</b> (63)
<b>millionth</b> (1)	<b>motivated</b> (5)	<b>nonevent</b> (1)	<b>offices</b> (1)
<b>mimosa</b> (1)	<b>motivation</b> (2)	<b>nonlegal</b> (1)	<b>officially</b> (1)
<b>mind</b> (11)	<b>mouth</b> (2)	<b>normal</b> (2)	<b>Oh</b> (30)
<b>mine</b> (3)	<b>move</b> (21)	<b>normally</b> (1)	<b>oil</b> (2)
<b>minimal</b> (1)	<b>moved</b> (1)	<b>Notary</b> (2)	<b>Ok</b> (1)
<b>minimum</b> (1)	<b>moves</b> (1)	<b>notch</b> (1)	<b>Okay</b> (668)
<b>minny</b> (1)	<b>movie</b> (17)	<b>note</b> (5)	<b>old</b> (14)
<b>minor</b> (1)	<b>movies</b> (3)	<b>noted</b> (5)	<b>once</b> (7)
<b>minute</b> (10)	<b>moving</b> (5)	<b>notes</b> (5)	<b>one-on-one</b> (1)
<b>minutes</b> (13)	<b>msharif</b> (1)	<b>notice</b> (2)	<b>ones</b> (4)
<b>mirror</b> (1)	<b>multiple</b> (5)	<b>noticed</b> (1)	<b>ongoing</b> (3)
<b>misapprehension</b> (1)	<b>multitude</b> (1)	<b>notwithstanding</b> (5)	<b>opened</b> (2)
<b>Mischaracterization</b> (1)	<b>Murphy</b> (3)	<b>November</b> (33)	<b>opening</b> (3)
<b>mischaracterizing</b> (1)	<b>Muslim</b> (1)	<b>now-fiance</b> (1)	<b>opinion</b> (11)
<b>misconstrued</b> (1)	<b>mute</b> (14)	<b>NUMBER</b> (22)	<b>opinions</b> (1)
<b>miserable</b> (1)	<b>muted</b> (5)	<b>numbers</b> (1)	<b>opposed</b> (1)
<b>misheard</b> (1)	<b>muting</b> (1)	<b>nuts</b> (1)	<b>opposite</b> (1)
<b>misinterpreted</b> (1)	<b>Myers</b> (1)	<b>NYE</b> (1)	<b>opposition</b> (1)
<b>misrepresent</b> (1)	<b>&lt; N &gt;</b>	<b>&lt; O &gt;</b>	<b>order</b> (3)
<b>misrepresentation</b> (3)	<b>name</b> (15)	<b>Obj</b> (1)	<b>ordered</b> (3)
<b>missed</b> (1)	<b>named</b> (3)	<b>object</b> (46)	<b>orders</b> (4)
<b>missing</b> (2)	<b>names</b> (4)	<b>objected</b> (2)	<b>ordinary</b> (1)
<b>mission</b> (3)	<b>narcotics</b> (2)	<b>objecting</b> (3)	<b>organization</b> (5)
<b>misstate</b> (1)	<b>natural</b> (1)	<b>objection</b> (132)	<b>outright</b> (1)
<b>mistaken</b> (3)	<b>nature</b> (1)	<b>objections</b> (5)	<b>outside</b> (12)
<b>misunderstanding</b> (1)	<b>Nazi</b> (1)	<b>objectively</b> (3)	<b>overall</b> (1)
<b>misunderstood</b> (2)	<b>NDA</b> (16)	<b>objects</b> (2)	<b>overboard</b> (1)
<b>mode</b> (2)	<b>NDAs</b> (1)	<b>obligated</b> (1)	<b>overreacting</b> (1)
<b>modified</b> (1)	<b>Neal</b> (14)	<b>obligations</b> (1)	<b>overworked</b> (5)
<b>moment</b> (7)	<b>near</b> (1)	<b>O'Brien</b> (5)	<b>owe</b> (1)
<b>moms</b> (1)	<b>necessarily</b> (1)	<b>observation</b> (1)	<b>owned</b> (1)
<b>Monday</b> (9)	<b>necessary</b> (2)	<b>observations</b> (2)	<b>&lt; P &gt;</b>
<b>money</b> (29)	<b>need</b> (32)	<b>observe</b> (1)	<b>P.C</b> (1)
<b>mongrel</b> (1)	<b>needed</b> (12)	<b>obvious</b> (2)	<b>p.m</b> (18)
<b>mongrels</b> (2)	<b>needs</b> (2)	<b>obviously</b> (5)	<b>PA</b> (3)
<b>monies</b> (1)	<b>nefarious</b> (1)	<b>occasion</b> (2)	<b>pad</b> (1)
<b>monitor</b> (1)	<b>negative</b> (1)	<b>occasions</b> (2)	<b>PAGE</b> (4)



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 PATRICIA (16)  
 patricia.mculty1@gm  
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 seth@dereksmithlaw.c  
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<b>Stacey</b> (1)	<b>subsequent</b> (1)	<b>technical</b> (2)	<b>thoughts</b> (3)
<b>Stacy</b> (1)	<b>substance</b> (2)	<b>technically</b> (1)	<b>thousand</b> (10)
<b>stage</b> (1)	<b>substantial</b> (2)	<b>telegram</b> (1)	<b>thread</b> (1)
<b>stalk</b> (1)	<b>successes</b> (1)	<b>tell</b> (103)	<b>threat</b> (1)
<b>stalked</b> (1)	<b>suck</b> (1)	<b>telling</b> (38)	<b>threaten</b> (1)
<b>stance</b> (1)	<b>sue</b> (1)	<b>tells</b> (3)	<b>threatened</b> (3)
<b>stands</b> (1)	<b>suffered</b> (1)	<b>ten</b> (10)	<b>threatening</b> (7)
<b>Star</b> (3)	<b>suggest</b> (2)	<b>tendency</b> (1)	<b>threats</b> (1)
<b>start</b> (10)	<b>suggested</b> (4)	<b>tendered</b> (1)	<b>three</b> (30)
<b>started</b> (24)	<b>suggesting</b> (1)	<b>tense</b> (1)	<b>three-year-old</b> (2)
<b>starting</b> (5)	<b>Suite</b> (3)	<b>tension</b> (1)	<b>throw</b> (3)
<b>Starts</b> (3)	<b>sultry</b> (1)	<b>tensions</b> (4)	<b>throwing</b> (2)
<b>state</b> (4)	<b>Sun</b> (2)	<b>tenure</b> (3)	<b>throws</b> (1)
<b>stated</b> (2)	<b>Sunday</b> (1)	<b>term</b> (4)	<b>Thursday</b> (2)
<b>statement</b> (10)	<b>super</b> (4)	<b>terminate</b> (1)	<b>ticket</b> (20)
<b>STATES</b> (4)	<b>supervise</b> (1)	<b>terminated</b> (3)	<b>tickets</b> (5)
<b>static</b> (1)	<b>supervised</b> (1)	<b>terminating</b> (1)	<b>tiff</b> (1)
<b>stating</b> (2)	<b>supervising</b> (2)	<b>termination</b> (2)	<b>Tiffany</b> (15)
<b>station</b> (3)	<b>supervisor</b> (2)	<b>terms</b> (7)	<b>till</b> (1)
<b>stay</b> (11)	<b>supervisors</b> (2)	<b>terrorism</b> (1)	<b>time</b> (170)
<b>stayed</b> (1)	<b>supervisory</b> (3)	<b>terrorist</b> (1)	<b>times</b> (26)
<b>staying</b> (1)	<b>supply</b> (1)	<b>terrorists</b> (1)	<b>tired</b> (4)
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<b>stepped</b> (1)	<b>supposed</b> (21)	<b>test</b> (2)	<b>tmcnulty82@gmail.co</b>
<b>stepping</b> (1)	<b>sure</b> (71)	<b>TESTIFIED</b> (14)	<b>m</b> (1)
<b>steps</b> (2)	<b>surname</b> (1)	<b>testifying</b> (2)	<b>today</b> (35)
<b>Stillwell</b> (1)	<b>surrounding</b> (1)	<b>testimony</b> (15)	<b>Today's</b> (3)
<b>stomach</b> (1)	<b>surveillance</b> (3)	<b>Text</b> (101)	<b>toes</b> (1)
<b>stone</b> (1)	<b>survival</b> (1)	<b>texted</b> (5)	<b>told</b> (144)
<b>stop</b> (123)	<b>Survivor</b> (1)	<b>texting</b> (1)	<b>Tommo</b> (4)
<b>storage</b> (1)	<b>swear</b> (2)	<b>texts</b> (6)	<b>Tommy</b> (22)
<b>store</b> (3)	<b>sweat</b> (1)	<b>Thank</b> (18)	<b>Tommy's</b> (3)
<b>stored</b> (1)	<b>SWORN</b> (1)	<b>Thankfully</b> (1)	<b>tomorrow</b> (12)
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<b>strategy</b> (1)	<b>take</b> (65)	<b>thing</b> (30)	<b>touch</b> (1)
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<b>style</b> (4)	<b>talking</b> (103)	<b>Thirty</b> (2)	<b>trained</b> (2)
<b>subject</b> (9)	<b>talks</b> (2)	<b>Thomas</b> (38)	<b>training</b> (4)
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<b>subscribers</b> (1)	<b>tech</b> (1)	<b>thought</b> (39)	<b>transcribed</b> (1)

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